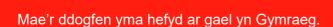




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Evaluability assessment of the **LGBTQ+ Action Plan for Wales**



This document is also available in Welsh.

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Views expressed in this report are those of the researcher and not necessarily those of the Welsh Government

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1. Introduction

- 1.1 The Welsh Government wants to make Wales the most LGBTQ+ friendly nation in Europe. To achieve this, the Welsh Government has published its LGBTQ+ Action Plan (Welsh Government, 2023), which outlines how it intends to achieve this goal. This Action Plan sets out the Welsh Government's strategy to improve the lives of LGBTQ+ people in Wales. Specifically, the LGBTQ+ Action Plan aspires to (i) strengthen equality and human rights; (ii) make Wales a safer space for all LGBTQ+ people; (iii) make Wales a sanctuary for LGBTQ+ migrants; (iv) improve healthcare outcomes; (v) ensure inclusive education; (vi) improve inclusion and participation in all areas of life; (vii) involve LGBTQ+ communities; and (viii) defend and promote the rights of trans and non-binary people.
- 1.2 The LGBTQ+ Action Plan should be considered alongside other Welsh Government Action Plans and strategies, including the Action on disability: the right to independent living framework and action plan (Welsh Government, 2019), the Advancing gender equality in Wales Plan (Welsh Government, 2020), the Violence against women, domestic abuse and sexual violence strategy (Welsh Government, 2022), the Anti-racist Wales Action Plan (Welsh Government, 2022), the HIV Action Plan (Welsh Government, 2023), and the Child Poverty Strategy for Wales (Welsh Government, 2024). Considering how these Action Plans complement each other and can be implemented together is an important part of the forthcoming Strategic Equality Plan for 2024 to 2028 (Welsh Government, 2023).
- 1.3 To assess the impact and success of the LGBTQ+ Action Plan, it is important that the Welsh Government considers how best it should be evaluated in the future. To advise on this, the Welsh Government commissioned Alma Economics in 2023 to carry out an evaluability assessment of the LGBTQ+ Action Plan.
- 1.4 This evaluability assessment aims to assess a range of options for evaluating the implementation and impact of the LGBTQ+ Action Plan, based on the Magenta Book (HM Treasury and Evaluation Task Force, 2020). It will provide recommendations on how the LGBTQ+ Action Plan could be evaluated and a Theory of Change of the LGBTQ+ Action Plan. The Theory of Change identifies the main impacts and causal mechanisms that would need to be assessed in an evaluation. This assessment will also consider how impact and success could be measured and what actions could be taken to improve the evaluability of the LGBTQ+ Action Plan in future, these are identified in the Databank in Section 3.

Structure of this report

- 1.5 The remainder of this report is structured as follows:
 - Section 2 summarises the methodology and approaches used in this research.
 - Section 3 details the findings from the various research workstreams, including the scoping exercise, literature review, Databank, qualitative fieldwork and the assessment of evaluation options.
 - Section 4 provides recommendations for the future evaluation.
 - The remaining sections are the Annex. Annex A provides greater detail on the findings of the literature review. Annex B contains a full write-up of interviews with the Welsh Government and external stakeholders. Annex C details definitions of Theory Based approaches. Annex D contains the discussion guides used for these interviews.

2. Methodology

- 2.1 This chapter sets out the method used for undertaking the evaluability assessment: the scoping exercise, literature review, stakeholder engagement and fieldwork, the theory of change, the Databank and the consideration of the evaluation options. The chapter also addresses methodological limitations.
- 2.2 This evaluability assessment has two primary objectives:
 - To develop a suite of evidence-based theories of change which show the scope and activities of the LGBTQ+ Action Plan for Wales. These detail how inputs will result in intended outputs, outcomes, and impacts (and the assumptions upon which these causal chains are based).
 - To conduct an evaluability assessment of the LGBTQ+ Action Plan, determining the extent to which different evaluation options can feasibly assess the implementation and impact of the LGBTQ+ Action Plan. The evaluability assessment will set out options for qualitative and quantitative data-gathering activities required for an effective evaluation.
- 2.3 The approach adopted for this evaluability assessment is outlined in the following steps, which are guided by the Magenta Book (HM Treasury and Evaluation Task

Force, 2020) and best practice. The primary purposes of an evaluability assessment are to inform whether an evaluation is feasible, when an evaluation could take place, and how to improve the likelihood of an evaluation producing useful results. As discussed in the Magenta Book, evaluability assessment outputs include: a Theory of Change, how outcomes of interest will be identified and measured, how wider contextual factors will be accounted for, detail on the methods to be used, the evaluation's research questions, and detail on the data required. This guidance forms the cornerstone of this evaluability assessment.

2.4 The delivery of this evaluability assessment was monitored by a Welsh Government Steering Group, whose advice was provided at important milestones during the evaluability assessment, this included identifying interviewees and reviewing iterative versions of the Theory of Change. Membership included the joint-branch heads of the LGBTQ+ Policy team and the head of the Equality, Race and Disability Evidence Units, who is part of the Welsh Government's Social Research profession.

Scoping exercise

2.5 A review of key documentation relating to the LGBTQ+ Action Plan was undertaken to provide further understanding of the LGBTQ+ Action Plan, including its primary objectives and aims and how it interacts with other Welsh Government equalities plans. Documents reviewed included the LGBTQ+ Action Plan, the LGBTQ+ Action Plan progress updates (Welsh Government, 2023), the Recommendations of the Independent LGBTQ+ Expert Panel (The Independent LGBTQ+ Expert Panel, 2021), the Strategic Equality Plan (Welsh Government, 2020), the Action on disability: the right to independent living framework and action plan (Welsh Government, 2019), the Advancing gender equality in Wales Plan (Welsh Government, 2020), the Violence against women, domestic abuse and sexual violence strategy (Welsh Government, 2022), the Anti-racist Wales Action Plan (Welsh Government, 2022), and the HIV Action Plan (Welsh Government, 2023). In addition, an understanding of what metrics are currently being collected and monitored by the Welsh Government was informed by reviewing the LGBTQ+ Action Plan progress updates (Welsh Government, 2023) and conducting four semistructured interviews with Welsh Government officials. Alongside providing background on the priorities and challenges for the evaluation, Alma's scoping interviews with Welsh Government officials sought to deepen understanding of the

data that would likely be available to the evaluation of the LGBTQ+ Action Plan. The discussion guide for the scoping interviews can be found in Annex D.

Literature review

- 2.6 A literature review was conducted to identify existing evaluations of similar policies and programmes which aimed to improve experiences and outcomes for LGBTQ+ people. It identified methodologies used to evaluate relevant policies, key challenges associated with the implementation of the evaluation, any recommendations made, and any data being collected for the evaluation.
- 2.7 Given the complexity of the LGBTQ+ Action Plan in terms of how it spans multiple policy areas, policies and programmes, the literature review also reviewed approaches for evaluating complex and multi-stranded programmes and how this could be applied to the LGBTQ+ Action Plan. This informed the long-listing evaluation options.
- 2.8 The literature review was a desk-based scoping literature review, which was undertaken between June 2023 and August 2023. Literature was identified by using Google Scholar and from documentation identified during the scoping exercise by Welsh Government officials. This included peer and non-peer-reviewed published journal articles, as well as grey literature such as relevant policy documentation to access the latest information, and any informal evaluations of recent action plans or strategies.
- 2.9 To conduct the literature review, two categories of keyword search terms were used. The first were words on intervention types which were 'interventions, behavioural, regulation, policy, evidence, financial support, incentives, social norms, information and awareness, service provision, training.' The second category was keywords on target populations and intersectionality. These words were 'LGBTQ+, transgender, vulnerable, socio-economic, depriv*, disadvantaged, disability, young people, adults, older adults, ethnicity, low income.' To shortlist the number of papers identified from these keywords, the scope was narrowed to focus on policies or strategies for which evaluations were undertaken. This search identified 52 papers which were deemed relevant and were therefore discussed in the full literature review.
- 2.10 The findings from this literature review were used to inform the evaluability assessment by providing an understanding on existing precedent of evaluations of

- similar programmes, which can identify potential risks, challenges and solutions relating to methodologies and evaluation tools.
- 2.11 The key findings from the literature review are in section 3, with a more detailed version in Annex A. A key limitation of this literature review was that it was not intended to follow a specific rapid evidence review or systematic review protocol as it was intended to be a targeted exercise with limited scope. As a result, the quality of evidence was not considered, and the list of evidence identified may not be exhaustive.

Stakeholder engagement and fieldwork

- 2.12 The complex and high-profile nature of the LGBTQ+ Action Plan required a wide range of stakeholders, policy officials and experts to be interviewed to inform evaluability assessment, including the development of the Theory of Change and the recommendations. Interviews were conducted in either one-to-one settings or in small groups. This evaluability assessment was informed by stakeholder engagement between the 20th of September 2023 and the 22nd of November 2023. There were 36 interviews with 50 interviewees. Of these, 12 one-on-one interviews were conducted with representatives of organisations external to the Welsh Government.
- 2.13 In total, 24 interviews, with 38 interviewees were conducted through video-calls in Microsoft Teams with a total of 38 Welsh Government officials who worked in policy areas relevant to the LGBTQ+ Action Plan. These interviews focused on understanding how the actions stated within the LGBTQ+ Action Plan would contribute to the impact of the LGBTQ+ Action Plan and how it could achieve its objectives. Discussions also considered relevant data and metrics that could be used to measure impact, as well as the views of Welsh Government officials on the priorities and approach to future evaluation. Using purposive sampling, contact details for interviewees were provided by the Welsh Government using an internal portal of contact details. An interview was successfully conducted with each department identified by the Welsh Government LGBTQ+ Action plan evaluability assessment Steering Group. This meant the full range of policy topics captured in the LGBTQ+ Action plan was covered. In some instances, multiple individuals working in the same department and policy area were invited to one interview..
- 2.14 A further 12 interviews were conducted with external organisations identified by the Welsh Government as stakeholders regarding the evaluation of the LGBTQ+

Action Plan. These organisations included charities and voluntary sector organisations with a strong focus on LGBTQ+ and intersectional issues. These discussions focused on understanding external perspectives on what successful implementation of the LGBTQ+ Action Plan would look like; how its impacts should be measured; and what should be considered for the approach to future evaluation. Where possible, discussions also considered how specific actions and themes of the LGBTQ+ Action Plan contribute to achieving the intended impacts. Using purposive sampling, the Welsh Government provided contact details for prospective interviewees to Alma Economics once their consent was provided. Interviews were held with representatives from the following organisations, all of which gave their consent to be named: Amber Project, Cardiff and Vale University Health Board's Youth Board, Fighting with Pride, National Museum for Wales, Pride Sports, Stonewall Cymru, Terrance Higgins Trust, Timbrell Education, TransVision Cymru, Undivided Consultancy, Unique Transgender Network, Viva LGBTQ+, and the Welsh Gender Service. Incentives were not used for the interviews with Welsh Government officials nor with external organisations.

- 2.15 These interviews were conducted to deepen understanding of what success means in the context of the LGBTQ+ Action Plan for Wales; inform the development of the Theory of Change; identify risks and assumptions that may impact the evaluability of the LGBTQ+ Action Plan; identify crucial data sources to support monitoring of the LGBTQ+ Action Plan; and provide views on how it should be evaluated.
- 2.16 The findings from the interviews are detailed in section 3, with a more detailed write-up in Annex B. Thematic analysis of the interviews informed the Theory of Change, evaluability assessment, and the Databank. Discussion guides for the interviews with Welsh Government officials and external organisations are available in Annex D. Interviews followed the thematic structure of the LGBTQ+ Action Plan, allowing for in-depth and detailed insights into each of its themes. Interviews were analysed by identifying and categorising the themes, these were then sub-categorised by sub-themes to identify key insights regarding the evaluation. Then, this thematic analysis was used to evaluate the extent to which some views were expressed more often than others.

Theory of Change development

2.17 The findings from the interviews were used to draft a Theory of Change which visually describes the mechanisms through which the activities and actions

included in the LGBTQ+ Action Plan may generate outcomes and impact. The Literature Review did not greatly impact the Theory of Change however was beneficial with regards to informing the evaluation of complex programmes. The Theory of Change is used to support the evaluability assessment by identifying important impacts and causal mechanisms which would need to be assessed in an evaluation and should therefore be considered in the evaluability assessment. The Theory of Change also helps to identify key indicators to monitor the progress and impact of the LGBTQ+ Action Plan, which in turn determines what data should be collected in advance of a future evaluation for this purpose.

2.18 An initial draft of the Theory of Change was presented to the Welsh Government through a dedicated workshop and was subsequently refined. The Theory of Change is presented in section 3.

Databank development

2.19 A Databank is presented in Section 3 of this report. It is informed by the literature review of existing evaluations, interviews with action owners and other stakeholders, and the development of a Theory of Change. The crucial actions and outcomes of the LGBTQ+ Action Plan were identified in interviews and reflected in the Theory of Change. The search for potential data sources was based on the activities, outputs and outcomes listed in the Theory of Change (see section 3). A crucial part of creating the Databank was to consider how the causal links within the Theory of Change could be evidenced. The Theory of Change provided a framework with which to analyse the potential to evidence the LGBTQ+ Action Plan. The quality, usefulness, and readiness of data sources were assessed, and recommendations were made to ensure that high-quality data sources will be available for the evaluation of the LGBTQ+ Action Plan for Wales.

Assessment of evaluation options

2.20 The approach to the evaluability assessment is based on the approach detailed in the Magenta Book and uses a systematic and widely recognised methodology to identify and assess a range of potential evaluation options to arrive at a suitable preferred option. This approach utilises the information collected in the previous stages, including findings from the literature review, interviews with Welsh

Government and external stakeholders, and Theory of Change. The evaluability assessment was conducted in the following stages:

- Identification of evaluation options longlist. A longlist was created to
 determine all potential evaluation options. In line with best practice, this longlist
 is typically based on the Magenta Book and fall into 3 groups: (i) Theory-based
 methods which are largely qualitative and/or mixed-methods; (ii) QuasiExperimental approaches; and (iii) Experimental approaches which are purely
 quantitative.
- Shortlisting of options. The longlist of options is whittled down to a shorter list of options (the 'Shortlist'), based on an assessment criteria agreed with the Welsh Government, which are deemed broadly feasible in the context of the LGBTQ+ Action Plan. The assessment criteria outline considerations such as robustness, impacts captured, data availability, resourcing requirements, stakeholder engagement and ethical consideration. In practice, the shortlisting assessment was conducted based on the three evaluation groups (Theorybased methods, quasi-experimental and experimental), recognising that the assessment would likely be the same across all options within each group.
- Assessment of the shortlist. Each evaluation option in the shortlist is
 assessed in further detail against the assessment criteria, to produce a
 recommended preferred evaluation option. It is recognised that there could be
 overlap across several options and it could be that several options could be
 feasible or be used together.
- Confirmation of the recommended option. The recommended option was presented at the Welsh Government Steering Group, along with the findings from the previous stages and rationale.
- 2.21 The recommended evaluation option is the primary output of this report. A summary of the recommended evaluation approach is detailed in section 0.

Methodological Considerations

- 2.22 There are some methodological limitations to the research that merit consideration here. These include that:
- 2.23 The literature review was a scoping literature review and therefore did not include a systemic evidence review or a structured criteria-based selection. It was

- therefore not designed to be exhaustive. The literature review also revealed that there was limited published evidence available on complex evaluations of multi-layered action plans to promote LGBTQ+ rights.
- 2.24 While 50 people were interviewed for this project including Welsh Government officials, arms-length bodies, and LGBTQ+ organisations widespread engagement with LGBTQ+ individuals was not conducted. This should be recognised, especially when considering the findings from stakeholder interviews and the resulting Theory of Change.
- 2.25 The Theory of Change relied on evidence from the scoping review primarily the LGBTQ+ Action Plan itself and interviews with Welsh Government officials and wider stakeholders. Due to the innovative actions within the plan and the lack of evaluations of policies to improve LGBTQ+ rights, it was not possible to validate the strength of the causal chains identified. This will therefore be a key objective of an evaluation of the LGBTQ+ Action Plan. It is also recognised that there are several approaches to developing a Theory of Change and it therefore may need to be reviewed by a future evaluator.
- 2.26 The Databank exercise was informed by the scoping literature review and interviews with Welsh Government officials. In addition, by the time of the evaluation, new data sources may be created or made more useful. This means the Databank (Table 1) should be viewed as a starting point for the evaluation and a tool for Welsh Government to use to drive-up data quality and availability rather than an exhaustive collection of the data sources which may be available at the time of an evaluation.

3. Findings of the Evaluability Assessment

3.1 This section details the findings from the evaluability assessment, which identifies and assesses a range of potential evaluation options to arrive at a suitable preferred option.

Findings from the literature review

3.2 The literature review is divided into three categories: the first assesses the literature on complex evaluations and its applicability to the LGBTQ+ Action Plan for Wales; the second reviews evaluations of multi-strand plans and system-wide strategies to improve the lives of LGBTQ+ people; and the third considers evaluations of specific interventions within the LGBTQ+ Action Plan for Wales. A summarised version is provided below, with a more detailed literature review available in Annex A.

Theory of complex evaluations

- 3.3 Due to its multiple action owners, causal strands, and the influence of external factors, the LGBTQ+ Action Plan is a complex system in need of a complexity-sensitive evaluation (Rogers, 2008; Glouberman and Zimmerman, 2002).
- The academic literature on complexity in evaluations emphasises the importance of using a Theory of Change a diagram that clarifies the causal pathways that link an intervention to its desired social outcomes (Chapman et al., 2023) when evaluating multi-stranded policy interventions within complex systems (Dyson and Todd, 2010). The literature also states that organisations should recognise that some changes are outside of their control with this being visualised within the diagram, such as through representing assumptions (Valters, 2014). The literature also states that Theories of Change can become outdated, especially in rapidly changing policy areas (Abercrombie et al., 2018). A Theory of Change may need updating between an evaluability assessment and an evaluation or during an evaluation itself (Mason 2007). Finally, the academic literature suggests that mixed-methods evaluations are best placed to address the challenges of complex interventions and evaluation requirements (Sanderson, 2003; Bristow et al., 2009).
- 3.5 Moving beyond academic theory, the authoritative guide on complexity for evaluation practitioners is the HM Treasury's supplementary guide to the Magenta Book, Handling Complexity in Policy Evaluation. The guide identifies eleven properties of complex systems, but four have been identified as most relevant for

the evaluation of the LGBTQ+ Action Plan. These four properties are openness (or open systems), feedback, unexpected indirect effects, and tipping points.

- Open systems are policy systems which are strongly influenced by the
 external factors. The system of the LGBTQ+ Action Plan for Wales is heavily
 influenced by external factors, such as UK Government policies. This
 evaluability assessment's Theory of Change will therefore highlight key
 external influences in an 'assumptions' column.
- Feedback loops occur when change is non-linear, such as when successful
 outcomes from a policy affect the implementation of a related policy. The HM
 Treasury guidance recommends that sufficient time is allowed for
 interventions to be implemented and for feedback loops to develop before
 beginning an impact evaluation. In-line with academic literature, anticipated
 feedback loops w be expressed within the Theory of Change to highlight
 them to evaluators and implementors (Davies, 2018; Desta Research, 2022).
- Unexpected effects and Tipping points are caused by long causal chains
 within complex systems. By their nature, these are difficult to predict. The HM
 Treasury guidance and academic literature suggests that system mapping
 can identify indirect effects, and that updating a Theory of Change prior or
 during an evaluation can also be useful (Mason, 2007).
- 3.6 In summary, when evaluating complex programmes, HM Treasury guidance emphasises the importance of using a Theory of Change to clarify the underlying causal pathway between a policy intervention and its desired societal outcome within complex systems. Academic literature suggests that Theories of Change should recognise the role of external influences. This in turn should be recognised in the choice of evaluation method, as identifying causality with such outcomes is likely to be difficult. This finding is applicable to individual strands and themes of the LGBTQ+ Action Plan, where key outcomes are likely to be impacted across multiple interventions spanning multiple themes of the LGBTQ+ Action Plan. The literature suggests mixed methodologies approaches to evaluation (i.e. those that use a combination of quantitative and qualitative techniques) are advisable given they will enable a flexible approach that can capture complexities and nuances of the programme and adapt to unexpected changes in the implementation of a complex intervention such as the LGBTQ+ Action Plan for Wales. More information on this literature review can be found in Annex A.

Evaluations of multi-strand LGBTQ+ strategies

- 3.7 A literature review of evaluations of similar multi-strand LGBTQ+ action plans in other countries was conducted. A search was conducted in a wide range of European languages for formal evaluations of plans similar to the LGBTQ+ Action Plan for Wales, with publicly-available formal evaluations only found in Norway. More information on these strategies is available in Annex A.
- 3.8 The evaluation of Norway's 2009-12 action plan found that the plan's primary objective of ending LGBT discrimination in Norway was "not realistic" within the four-year timeframe and "appears more like a vision to strive for than a goal that is possible to reach" (Norwegian Directorate for Children, Youth and Family Affairs, 2013). It also found that vaguer pledges and actions were not as frequently well-implemented. The cornerstone of its methodology was a survey of the employees in Norwegian Government ministries, which found that the plan was not viewed as relevant to the work of all Norwegian ministries. An evaluation of Norway's 2017-2020 LGBT action plan found that actions with multiple action owners and a lack of measurable or time-specific targets undermined Norway's 2016-2020 action plan (Proba Samfunnanalyse, 2021; 2021a).
- 3.9 Beyond Norway, evaluations of LGBTQ+ action plans are more limited. For example, the UK Government (2019), the Irish Government (2019), the Government of Malta (2023), the Parliament of Iceland (2022), and Greek Government (2022) only make public monitoring updates or progress reports on the implementation of their action plans, with no evidence of formal evaluations or Theories of Change for their LGBTQ+ action plans. In many cases, especially the Icelandic Action Programme 2022-2025, the ILGA-Europe Rainbow map is relied upon to monitor the success and impact of LGBTQ+ action plans. While talks are ongoing, Wales is not currently represented within the ILGA-Europe Rainbow Map distinctly from the rest of the UK. This means that policy changes on LGBTQ+ rights in Wales will not be reflected in ILGA's rankings.
- 3.10 Ultimately, the evidence base on evaluations of relevant LGBTQ+ strategies and programmes is scarce. While LGBTQ+ action plans are relatively common across Europe, the vast majority of international LGBTQ+ action plans do not undergo formal, publicly available evaluations. The most relevant evaluations relate to Norway's LGBT action plans (2009-2012; and 2017-2020), however these largely

focused on a process evaluation approach which were highly limited in scope and therefore provide limited findings for this evaluability assessment. For example, they predominantly consisted of a survey of government ministries and no Theory of Change was developed. However, the survey of Norwegian Government staff for the evaluation of Norway's 2009-2012 LGBT Action Plan revealed that a strong minority of Norwegian Government ministries believed that the plan was not relevant to their ministries – this suggests that a similar survey of senior officials in the Welsh Government could be used to deduce the extent to which the LGBTQ+ Action Plan is prioritised and viewed as relevant within the Welsh Government.

Evaluations of interventions within the LGBTQ+ Action Plan for Wales

- 3.11 In recognising the highly limited number of evaluations of multi-strand LGBTQ+ action plans, the literature review included consideration of how the specific interventions in the LGBTQ+ Action Plan for Wales have been evaluated elsewhere. This sub-section therefore considers existing evaluations of interventions similar to those described in the LGBTQ+ Action Plan. It does not seek to provide an overview of "what works" with respect to LGBTQ+ policies. When evaluations are identified, this review primarily reports on their methodological approaches. Where evaluations are not available, guidance on best practice will be considered. The full and detailed literature review broken down by themes within the LGBTQ+ Action Plan for Wales can be read in Annex A. The key findings of this section of the literature review are:
 - Generally, there is a lack of impact evaluations of LGBTQ+ interventions which can be used as a template for an evaluation of the LGBTQ+ Action Plan for Wales.
 - Some UK-based studies (e.g. Chakraborti and Hardy, 2015) seek to recruit LGBTQ+ participants in-person through cafes, bars, and community groups to increase the likelihood of recruiting individuals who are not already involved in LGBTQ+ organisations. The goal is to engage a broader and more representative sample of LGBTQ+ people.
 - A systematic evidence review of educational materials for health and social care professionals in LGBTQ+ issues suggests that interventions are effective at tackling negative attitudes and behaviours towards LGTBQ+ people if they involve direct interaction between heterosexual staff and an LGBTQ+ peer or lecturer that they already know, and many of the purely

educational interventions without personal interaction are ineffective (Hunt *et al.*, 2019). This suggests that measuring the level of personalisation in LGBTQ+ training could be used in an evaluation of the LGBTQ+ Action Plan for Wales.

• Broadly, qualitative data was identified as key to evaluating LGBTQ+ interventions. This is because quantitative data is usually collected in insufficient sample sizes to adequately represent the diverse and intersectional experiences of the LGBTQ+ community – and can be too simple to gain in-depth information. For example, a comprehensive evaluation of LGBTQ+ inclusion and participation in Australian sport relied on qualitative information due to sample sizes and that LGBTQ+ acceptance could only be measured qualitatively – and not through quantitative evidence such as the number of LGBTQ+ people in a sporting club (Storr et al., 2021).

Interviews with stakeholders

- 3.12 This section sets out the findings from the qualitative interviews with stakeholders, the first section discusses the overall outcomes for success of the LGBTQ+ action plan. The second section discusses key factors to be considered when evaluating the LGBTQ+ action plan. The third section highlights potential organisations who could be approached for involvement in the evaluation. To allow organisations to speak freely, these answers are attributed to "external interviewees" rather than the organisations themselves. Interviewees provided different views, and many specialised in their areas of expertise, however interviewees broadly agreed that the following outcomes would indicate that the LGBTQ+ Action Plan had been implemented successfully:
 - a greater awareness of the LGBTQ+ community and its rights among the public and policymakers,
 - increased reporting of LGBTQ+ hate crimes and awareness of the ways to report hate crimes, a stronger relationship between the police and LGBTQ+ communities,
 - the new LGBTQ+ inclusive curriculum being implemented and leading to more LGBTQ+ inclusive schools with a reduction in anti-LGBTQ+ bullying,

- inclusive health practices leading to greater confidence among LGBTQ+
 people when using general healthcare services, fertility services, maternity
 services, and gender services,
- ensuring LGBTQ+ human rights are adhered to, through the reform of the Gender Recognition Act and the banning of conversion therapy,
- the creation of a Gender Service for young people within Wales was identified as a crucial outcome of the LGBTQ+ Action Plan for Wales by external stakeholders.
- 3.13 While most of the outputs from the interviews informed the development of the Theory of Change and assessment of quantitative data via the Databank, there are several findings relevant to the evaluability assessment that appeared consistently across interviews.
 - Quantitative measures should not be used in isolation and be used cautiously when evaluating the LGBTQ+ Action Plan. Stakeholders overwhelmingly cautioned that a reliance on quantitative measures would risk not capturing the full diversity of experiences within the LGBTQ+ community. Interviewees were aware that there is a general lack of quantitative data available at a suitable granularity for assessing the impact of interventions within the LGBTQ+ Action Plan. This means that LGBTQ+ experiences can be treated as homogenous by quantitative data, which risks obscuring the challenges faced by women, trans people, ethnic minorities, asylum seekers, and other groups. In addition, some interviewees noted that quantitative methods often involve a risk of potential bias (e.g. sampling, unconscious and historical bias) which are not immediately obvious. There is also a general lack of quantitative data available of suitable granularity (a sufficient level of detail or precision) for assessing the impact of interventions within the Action Plan.
 - An emphasis on understanding perceptions and lived experiences of
 LGBTQ+ people and intersectional experiences through high-quality
 qualitative data collection methods (interviews, smaller focus groups) to
 understand impact. This allows for detailed understanding of the experiences
 of each group. People are more likely to engage with and trust an evaluation
 that evidently listens to people. Interviewees strongly welcomed the idea that
 qualitative fieldwork engages LGBTQ+ people directly across Wales. This

means that the evaluation should consider using LGBTQ+ centres and groups across Wales to recruit for fieldwork. Some were concerned that representative bodies and social media recruitment may not reflect a representative sample of LGBTQ+ experiences in Wales. However, the anonymity and widespread nature of social media are expected to be important to capture the perspectives of LGBTQ+ individuals who are not 'out'.

- Ensuring representation of people with intersectional identities across
 the LGBTQ+ community in the evaluation, as these individuals can have
 unique experiences that may not be captured in a whole-population
 approach.
- There are two main effects to consider in an evaluation: (i) How has the LGBTQ+ Action Plan improved LGBTQ+ peoples' lives and experiences; and (ii) How has the LGBTQ+ Action Plan led to the embedding of LGBTQ+ awareness consideration in general policymaking?
- Some outcomes will take longer to be realised especially those relying on behavioural change among the general public. This suggests that not all changes resulting from the LGBTQ+ Action Plan will be evident by the end of the 2021-2026 Senedd term.
- There should be recognition of the overlap with other Action Plans,
 especially on areas of common grounds such as tackling hate crimes and
 bullying. Interviewees suggested that these aspects of the LGBTQ+ Action
 Plan should be delivered and evaluated in a joined-up way.
- 3.14 In addition, interviewees highlighted the following opportunities to recruit LGBTQ+ people across Wales to engage with qualitative fieldwork as part of the evaluation process:
 - LGBTQ+ social spaces, such as the Queer Emporium in Cardiff.
 - Hoops and Loops.
 - LGBTQ+ sporting clubs and teams.
 - Stonewall Cymru.
 - Student Union LGBTQ+ groups in Welsh universities.
 - Support groups for LGBTQ+ veterans.

- Trans Vision Cymru.
- Unique Transgender Network.
- Welsh trade unions and their equalities networks.
- Youth work settings, especially LGBTQ+ youth clubs such as Viva LGBTQ+.
- 3.15 A full and detailed write-up of the interviews is available in Annex B.

Theory of Change

- 3.16 This evaluability assessment included the production of a Theory of Change, informed by the literature review and 36 interviews with stakeholders. A workshop with the Welsh Government Steering Group created for this evaluability assessment also informed the resulting Theory of Change.
- 3.17 The purpose of a Theory of Change is to deepen understanding of the theoretical causal pathways between a policy intervention and the desired outcomes. A Theory of Change uncovers assumptions along this pathway that can be tested by an evaluation. They are used to develop a consensus on key impacts from different aspects of an intervention and identify key outcomes that should be monitored in an evaluation.
- 3.18 By the time of the evaluation, the Theory of Change may need to be updated. For example, outputs or outcomes which are not yet predictable may have developed and require representation in the diagram. In addition, there are different ways of representing theories of change, and a future evaluation may want to revisit the decisions made in the production of this Theory of Change to suit their evaluation methods and priorities.
- 3.19 This Theory of Change includes the following symbols:
 - The arrows (ranging from 'Action' to 'The Overall Vision' represent the policy implementation process. The 'Actions' in the plan result in 'Activities' which, if implemented, lead to 'intermediary outcomes' and some 'intermediary outputs', which are then followed by longer-term 'Outcomes'. These outcomes represent real changes in LGBTQ+ lives. Each 'Outcome' contributes to meeting 'The Overall Vision' of the LGBTQ+ Action Plan for Wales, identified by Alma Economics through intensive stakeholder engagement and confirmed by the Steering Group. The Overall Vision, unites

each Theme under a shared vision. 'Intermediary outputs' are represented within the 'intermediary outcomes' column due to there being too few identifiable outputs at this stage of the evaluability assessment to merit a separate column. Once more outputs are clear, evaluators may wish to change how outputs are represented in the diagram.

- Lined white borders indicate items that are not directly represented in the Action Plan but are instead rooted in the interviews undertaken with internal and external stakeholders. Text within thick white borders between coloured lines has been added to clarify causal pathways and make the Theory of Change more relevant and cohesive. Text that is not within white borders is rooted in the LGBTQ+ Action Plan for Wales but is often summarised.
- The Key Assumptions column collates information from stakeholder engagement and the literature review regarding the assumptions and dependencies within the LGBTQ+ Action Plan. All assumptions are rooted in findings from the scoping phase and interviews with internal and external stakeholders. Within which:
 - Feedback loops are included in this Theory of Change because not all changes flow neatly from activities to outcomes – they also flow "backwards". Feedback loops are therefore used to highlight when the outcomes affect the implementation of an activity or the degree to which an output is achieved. These are an assumption and are therefore explained in greater detail within the Key Assumptions column.
 - Risks are also identified within the Key Assumptions column. These stem from the interviews and highlight risks for evaluators and policy implementors to recognise. If an outcome is not achieved, the risks may help explain what the underlying challenges were. Consideration of the key risks can ensure that challenges are mitigated and actions and outcomes are achieved.

Theme A: Human rights and recognition

Actions

Ban all aspects of LGBTQ+ Conversion Practices

Trigger a request to devolve powers in relation to Gender Recognition

Improve understanding of LGBTQ+ human rights and representation in equality forums

Provide recognition of non-binary and intersex people in official documentation

International engagement showcases our LGBTQ+ values and support in Wales and globally

Activities

Seek and use powers to ban conversion practises

Highlight the harms of conversion practises and support for survivors

Identify ways to support Gender Recognition Certificate applicants in Wales

Share resources on the rights of LGBTQ+ people

Monitor and improve LGBTQ+ representation in equality forums and public service design

Project that Wales is an LGBTQ+ friendly nation and raise the importance of LGBTQ+ rights in diplomatic engagements

Intermediary outcomes

Reduced number of LGBTQ+ people who experience conversion practices in Wales and improved access to service for survivors

Trans people are helped to obtain a GRC in Wales

Intermediary outputton-binary identities are recognised in driving licenses, passports, and Welsh Government publications

Welsh population and service providers are aware of LGBTQ+ rights and how to react if they are not upheld by others

Intermediary outputublic services are designed to better serve LGBTQ+ people.

Outcomes

LGBTQ+ people are recognised, and can access services as their true selves, in accordance with their gender identity and sexual orientation

Welsh Government support for trans communities is visible

LGBTQ+ people are supported by the Welsh Government and other public bodies in Wales – and feel that they are supported

Wales is recognised globally as an LGBTQ+ friendly nation – and has a positive impact on LGBTQ+ rights abroad.

The Overall Vision

LGBTQ+ people can freely express themselves, be recognised, and live as their true selves in a safe, welcoming, and inclusive country

New partnerships, practises, and working relations are formed within Welsh Government and with partners. These improve the implementation of the Action Plan and the continuation of its work

Welsh public services recognise intersectional needs and are consistently safe, welcoming, inclusive, and empowering for LGBTQ+ people

Wales is recognised as an LGBTQ+ friendly country by LGBTQ+ people in Wales, in national and international media, and wider stakeholders

Key Assumptions

UK Government devolves or suitably reforms the relevant laws on conversion practises, gender recognition, passports, and driving licenses.

Greater LGBTQ+ representation in equality forums and public design leads to public services better serving LGBTQ+ people.

Increased awareness of LGBTQ+ rights leads to improved treatment of LGBTQ+ people in Welsh society and public services.

Key risks to be aware of

An anti-LGBTQ backlash provoked by legal reforms.

Theme B: Safety and Freedom from Discrimination

Actions

Remove barriers to LGBTQ+ people reporting hate crime

Launch a revised version of the Hate Hurts Wales campaign and counter online anti-LGBTQ+ attitudes

Improve the relationship of LGBTQ+ communities with Policing in Wales

Target violence against women, domestic abuse and sexual violence (VAWDASV) among LGBTQ+ communities

Homelessness services are inclusive of the specific needs of LGBTQ+ people

Activities

Improve LGBTQ+ representation in the PCSO workforce

Gather evidence of barriers to reporting hate crime among LGBTQ+ people. Improve procedures and guidance for officers accordingly

Support schools with the teaching of online safety

Encourage the provision of a forum for police to meet with LGBTQ+ communities

Improve understanding and data on LGBTQ+ VAWDASV experiences – and provide longterm funding for DASV services

Ensure that LGBTQ+ people influence new policy and laws on homelessness prevention

LA staff – especially those working with homelessness - are fully trained on LGBTQ+ rights

Intermediary outcomes

LGBTQ+ people are confident to report hate crime and trust processes

Increased awareness of what anti-LGBTQ+ hate crimes and online hate are, the ways to report them, and how to receive support – inc. through the Wales Hate Support Centre

Potential perpetrators are shown the consequences of hate crime

LGBTQ+ communities feel confident to engage with law enforcement

Homelessness services engage sensitively with LGBTQ+ people

Improved understanding of the barriers to LGBTQ+ people reporting VAWDASV and their needs are considered and reflected in guidance and literature

Outcomes

Improved levels of reporting and recording of LGBTQ+ hate crime

Fewer anti-LGBTQ+ hate crimes committed in Wales

Specific intersectional needs of LGBTQ+ people, particularly those from disabled communities and Black, Asian, and Minority Ethnic communities, are met

LGBTQ+ people facing homelessness feel that support is easy to understand, and resources are accessible

A better experience for LGBTQ+ people reporting VAWDASV

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Key Assumptions

Funding of policing in Wales is sufficient to implement activities

Better reporting and recording of hate crimes leads to justice which deters future hate crimes.

Note: This is represented by the arrow within outcomes column.

More LGBTQ+ PCSOs increase community trust in Welsh policing this increases confidence to report hate crimes to the police.

Feedback Loop: As LGBTQ+ victims of hate crimes receive justice, LGBTQ+ communities will feel more confident to engage with law enforcement services and report hate crimes

Key risks to be aware of

Police relationship with LGBTQ+ community is worsened by outreach efforts – or by events

---- Feedback Loop

Theme C: A nation of sanctuary for refugees and asylum seekers

Actions Activities Identify, safeguard and signpost LGBTQ+ people in claiming asylum Negotiate with UK Government to amend the ASF1 form to capture data on gender identity

Work with relevant agencies to facilitate meeting the information, advice and advocacy needs of LGBTQ+ asylum seekers in relation to accessing homes

and sexual orientation

Gather experiences of LGBTQ+ asylum seekers on housing, the asylum process, and integration to Wales

Work with specialised LGBTQ+ asylum and refugee support services to understand the needs of LGBTQ+ asylum seekers and refugees – create appropriate training

Intermediary outcomes

Intermediary output: ASF1 form and Asylum Case Worker Guidance is amended and updated

Local authority, public bodies and third sector staff are fully up to date with the rights and entitlements of LGBTQ+ migrant groups

Views of LGBTQ+ asylum seekers in Wales shared with the Home Office

Intermediary output: There is tailored training for relevant service providers, public bodies and organisations in Wales concerning rights and issues of LGBTQ+ refugees and asylum seekers in Wales

Outcomes

LGBTQ+ asylum seekers and refugees feel that the Welsh Government's commitments to making Wales a Nation of Sanctuary are inclusive of LGBTQ+ people

Services, including advice services become fully accessible to the full diversity of asylum seekers

Services, including advice services, can demonstrate how they have become more accessible to the full diversity of asylum seekers, with necessary safeguarding and welfare considerations implemented

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Key Assumptions

UK Govt amend ASF1 forms

Asylum seekers feel safe to disclose sexual orientation or gender identity

Home Office and its housing providers are responsive to Welsh Government's priorities on safeguarding LGBTQ+ people

Feedback Loop: If LGBTQ+ recognise that Wales is a Nation of Sanctuary, they may be more likely to identify themselves as LGBTQ+ and therefore access inclusive services and Wales' reputation as a nation of sanctuary is improved.

Key risks to be aware of

UK Government's policies may overshadow recognition of Wale: as a Nation of Sanctuary for LGRTO+ refugees and AS

Ensure Wales a Nation of Sanctuary remains inclusive of LGBTQ+ people

Encourage the development of

LGBTQ+ only asylum properties

in Wales

Feedback Loop

Theme D: Health and social care (Part 1: general services)

Actions

Understand and improve the experience of LGBTQ+ people in the health and social care sectors:

- · Training and Workplaces
- Inspection
- Complaints
- Outcomes and experiences

Improve the data recording and change processes for maintaining trans, non-binary and intersex people's (TNB&I) medical records

Activities

Better understanding experiences of LGBTQ+ staff in the NHS

Review existing research and evidence, identify the barriers LGBTQ+ people face when accessing health and social care

Work with Social Care Wales to design, roll-out and evaluate training for staff in social care

Inspections by HIW and CIW consider LGBTQ+ service users' experiences of care and support

Improve recording of protected characteristics in health and social care complaints

Ensure that a change of sex and gender details is used throughout NHS systems

Understand the needs of TNB&I patients regarding clinical data recording

Intermediary outcomes

Intermediary output: Training for NHS Wales staff on inclusive healthcare practices is reviewed and any gaps are addressed

Intermediary output: Training is inclusive of LGBTQ+ needs in health and social care workplaces and is recognised as an important part of initial training and continuous professional development

HIW or CIW identify health and care settings which do not meet standards regarding treatment of LGBTQ+ individuals

NHS communication reflects the needs of trans and non-binary people

Outcomes

Welsh Government and other relevant bodies use CIW and HIW reports – and complaints – to identify systematic shortcomings in LGBTQ+ experiences and improve standards nationally

LGBTQ+ people feel safe, respected, and understood when using health and social care services

LGBTQ+ people feel safe, respected, and understood in care homes

LGBTQ+ people have improved access to healthcare services and a reduced risk of exclusion

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Key Assumptions

Funding of health and care services is sufficiently high enough for activities to be implemented.

The training of health and social care professionals on LGBTQ+ issues is well-funded, well-attended, and effective

Shortcomings identified by HIW and CIW are rectified by settings. If widespread shortcomings are found, Welsh ministers act quickly to rectify these

Key risks to be aware of

Interviewees highlighted that a focus on LGBTQ+ issues – in isolation from other intersectional groups – may be ineffective.

Theme D: Health and social care (Part 2: specialist services)

Actions

Ensure maternity and fertility services are accessible for LGBTQ+ people

Ensure the new mental health strategy takes account of LGBTQ+ people and develops actions to reduce inequalities in access and outcomes from mental health services

Publish and act on a new HIV Action Plan

Overcome barriers to LGBTQ+ people accessing sexual health services

Review the Gender Identity Development pathway for young people in Wales

Continue to develop the Wales Gender Service (WGS)

Activities

Review and improve access for IVF and fertility pathways and services for LGBTQ+ people

Fertility guidance refers to AFAB and AMAB patients on an NHSfunded pathway for gender reassignment, and how they access fertility provision

Establish an oversight group to monitor delivery of the actions within the HIV Action Plan

With wide engagement, consider options for the development of a gender service for young people in Wales

Further reduce waiting times for the WGS Enable GPs to initiate hormone therapy for adults

Understand needs of non-binary people accessing the WGS

Intermediary outcomes

Single sex families can access fertility treatment equally

Trans people have timely access to gamete storage that does not unduly delay a medical transition

Reduce cases of late diagnosis of HIV

Trans children and young people in Wales can access gender services closer to where they live

Health services for trans children and young people are focused on clinical need and based on clinical evidence

Outcomes

Equal outcomes and experience for LGBTQ+ people using fertility and maternity services

LGBTQ+ people are confident that mental health services meet their needs

Wales meets the target of zero new HIV transmissions by 2030 and people living with HIV are satisfied with their care

LGBTQ+ people in all regions of Wales feel they can have easy, private, and confidential access to sexual health service

Trans and non-binary people – inc. children, young people, and adults – are confident the WGS and referral pathways meet their healthcare needs

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Key Assumptions

Funding of specialist health services is sufficient for activities to be implemented

Gender service pathway for young people in Wales is currently strongly linked to developments in England. This will remain true unless a Welsh Gender Service for under-18s is established

HIV Action Plan is implemented and effective

Key risks to be aware of

External stakeholders strongly favoured a Welsh Gender Servici for under-18s – there will be disappointment if this is not achieved, which could affect the implementation of other Actions and stakeholder engagement in the evaluation of the plan.

Theme E: Inclusive Education

Actions

Provide trans guidance for schools and local authorities

Improve and publish the "Rights, respect, equality" – statutory guidance

Support LGBTQ+ young people and tackle homophobic, biphobic, and transphobic bullying

Design and implement a whole school approach that is fully LGBTQ+ inclusive

Ensure that all colleges and universities in Wales are LGBTQ+ inclusive environments for learners, students and staff

Activities

Provide professional learning opportunities – including during ITE – in recording and challenging prejudiced bullying

Engage with LAs to improve access to – and use of – data on anti-LGBTQ+ discrimination

Support schools with LGBTQ+ inclusive RSE code and guidance

Ensure education supporting resources contain materials that are LGBTQ+ inclusive, including in Welsh Language

Work with HEFCW to encourage universities to consider intersectionality when supporting staff and students

Commission a thematic review of peer-on-peer sexual harassment in further education, which will include homophobic bullying

Intermediary outcomes

Schools and LAs have the resources necessary to implement statutory guidance

LGBTQ+ young people know how to get support when facing discrimination or bullying

Educational settings have the tools need to successfully implement the RSE Code and Guidance in Welsh and English

Education settings have access to a range of LGBTQ+ inclusive resources in Welsh and English

Intermediary output: Improved evidence base on the experiences of LGBTQ+ learners and recommendations to tackle issues around homophobic discrimination in FE

Outcomes

Trans people feel safe, valued, and included in education

LGBTQ+ young people report lower levels of bullying and discrimination

LGBTQ+ Welsh-speaking and non-Welsh-speaking young people see themselves reflected in their school environment, education, and literature

LGBTQ+ students are be able to pursue their studies and career in an environment free from harassment, discrimination or victimisation

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Key Assumptions

Transgender Guidance for Schools is effective and implemented across Welsh schools

Anti-bullying guidance is effective and implemented across Welsh schools

Improved evidence base of LGBTQ+ learner experiences in FE results in reforms that improve LGBTQ+ experiences in FE

Key risks to be aware of

The debate regarding Trans
Guidance may be toxic, harming
young trans people and exposincisgender pupils to transphobic
views. A legal challenge could
also delay and undermine the
implementation of the guidance

Theme F: Communities, private, and family life

Actions

Support the family lives of LGBTQ+ people

Support the LGBTQ+ youth work sector

Support dialogue between faith groups and LGBTQ+ people

Provide support for LGBTQ+ people to participate in democracy, including standing for elected positions

Support Pride across Wales

Use LGBTQ+ awareness events to amplify LGBTQ+ voices and recognise underrepresented communities

Support LGBTQ+ Veterans

Activities

Ensure that the resources of existing services meet the needs of families of LGBTQ+ young people

Explore options for a longer-term funding model for youth work organisations that support a diverse range of young people

Work to establish conversations between faith groups and LGBTQ+ communities

Build on the "Equal Power Equal Voices" and "Access to Elected Office Fund" programmes

Support local pride organisations through the *Grassroots Fund*

Support charities – such as
Fighting with Pride – and support
groups for LGBTQ+ Veterans

Intermediary outcomes

Intermediary output: The production of resources for all ages on LGBTQ+ families, in English and Welsh, is supported.

LGBTQ+ young people are able to access youth work services that are relevant to them, and they have safe spaces to go to

LGBTQ+ people of faith feel accepted in their faith communities

Greater LGBTQ+ representation in public life

Local pride events are able to serve their LGBTQ+ populations better, including in rural areas

LGBTQ+ Veterans aware of the opportunity to be heard in LGBTQ+ Review and two-year window to apply for restitution

Outcomes

All family members feel confident on how to support their LGBTQ+ family members, including children and young people

LGBTQ+ young people have greater self-confidence to be who they are and knowledge of their own and others' rights

LGBTQ+ representation improves policy processes and outcomes

Improve experiences – and connectivity – of LGBTQ+ people in all parts of Wales

LGBTQ+ Veterans in Wales feel supported as an integral part of the wider Veterans community

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LGBTQ+ friendly country by LGBTQ+ people in Wales, in national and international media, and wider stakeholders

Wales is recognised as an

Key Assumptions

Families are aware of Welsh Government's parenting resources, including its LGBTQ+ specific parenting resources

Youth work services have sufficient funding to provide LGBTQ+ specific services across Wales.

More LGBTQ+ people in elected office means they have the power and influence to improve policy outcomes for LGBTQ+ people

Local Pride events improve the lives of LGBTQ+ people across Wales and promotes positive interaction between communities

Key risks to be aware of

Potential challenges related to prioritisation of actions, including actions on LGBTQ+ Veterans

Theme G: Sport and Culture

Actions

Improve the representation, inclusion, and participation of LGBTQ+ people in sports

Improve the access and participation of transgender people in sport

Celebrate and improve the representation of LGBTQ+ communities in the heritage and culture of Wales

Increase the involvement of LGBTQ+ people and organisations in the design of cultural events and activities

Activities

Improve LGBTQ+ representation at all levels in sport and culture

Ensure the sports workforce are aware of events and activities at local, regional, and national level – and their training includes equality awareness

Commission further research into trans experiences in sports

Work with sports bodies to improve trans inclusion policies and guidance in Wales and assess their implementation

Partner with organisations to support the collection and displaying of LGBTQ+ history

Work with partners to ensure the Welsh language speakers' needs are met in the representation of LGBTQ+ culture

Encourage cultural public bodies to include LGBTQ+ communities in their objectives and outcomes

Intermediary outcomes

Higher attendance at LGBTQ+ sporting events across Wales due to sports workforce being able to signpost people to them

Intermediary output: An assessment of the implementation and effectiveness of the Transgender Inclusion in Domestic Sport Guidance

More sporting bodies in Wales adopt trans-inclusive policies ar these are implemented consistently and at all levels

Greater cultural options for LGBTQ+ Welsh-language speakers

cultural services are engaged and aware of LGBTQ+ events or activities at local, regional, and national level

Outcomes

LGBTQ+ community is better represented and accepted in both sport and culture sectors

Transgender people feel included and accepted in the sport sector

LGBTQ+ culture and history are better represented in the cultural sector

Welsh language speakers' needs are met in the representation of LGBTQ+ culture

Over the long-term, these outcomes promote tolerance and understanding of LGBTQ+ communities in Wales

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Key Assumptions

When made aware of events and activities, those working in sport sign-post people to LGBTQ+ sporting events across Wales

Sporting National Governing Bodies are receptive to WG's advice on trans guidance

Smaller cultural events continue to collect LGBTQ+ culture. This is key to Amgueddfa Cymru being able to permanently collect and archive items from local, temporary events

Feedback Loop: As people see LGBTQ+ history is represented sensitively, they will be more likely to donate their own LGBTQ+ historical collections. This means more Welsh LGBTQ+ culture can be collected and displayed.

Key risks to be aware of

Rhetoric and organisations not based in Wales may directly and indirectly undermine Welsh transinclusionary sporting policies

Feedback Loop

Theme H: Inclusive Workplaces

Actions

Remove unnecessary personal identifications from recruitment practices

Provide equalities training that includes the needs of LGBTQ+ people to all public sector organisations

Encourage private sector employers to be LGBTQ+ inclusive

Activities

Implement a new Welsh Government recruitment system which supports name-free recruitment – and where age and gender markers are removed where necessary

Identify any gaps in current provision of equalities training – in line with the PSED - and work with groups to ensure those gaps are filled

Work in social partnership to encourage employers to

- promote, share and adopt best practice for inclusive workplaces
- adopt equalities policies and procedures that safeguard against LGBTQ+ discrimination
- provide guidance to employers on the importance of collecting diversity data

Intermediary outcomes

Removed barriers in recruitmer and increased applicant confidence

Non-binary and intersex people are not required to choose a sex/gender that does not apply

Intermediary output: Intersectional equalities training devised and delivered to public sector organisations in line with the PSED.

LGBTQ+ people understand and use pathways for reporting LGBTQ+ discrimination in workplaces

Increase in the availability of diversity data from private sector

Improved knowledge and awareness of LGBTQ+ workplace rights and employer responsibilities

Outcomes

More LGBTQ+ feel comfortable ir applying to work for the Welsh Government

All public service workers understand LGBTQ+ rights, needs and barriers

More LGBTQ+ inclusive workplaces in Wales

A decline in levels of reported LGBTQ+ discrimination in Welsh workplaces

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Assumptions

Regulation of the private sector is a reserved matter, so any changes made by the UK Government would affect the implementation of these actions.

Key risks to be aware of

None identified, apart from a recognition of the limited power of Welsh Government over private employment practises

Theme I: Impact of Covid-19

The Overall Vision Activities Assumptions Outcomes Actions Intermediary outcomes Review is acted upon and informs LGBTQ+ people feel supported LGBTQ+ people can freely In planning and implementing a Support LGBTQ+ spaces and LGBTQ+ spaces and services measures put in-place to improve to overcome negative impacts express themselves, be recovery response to COVIDservices with targeted special receive targeted special Covid-19 LGBTQ+ lives following the caused by the coronavirus recognised, and live as their true 19, to consider the experiences pandemic, including measures by COVID-related funding. pandemic. selves in a safe, welcoming, and of LGBTQ+ people, particularly the UK Government. inclusive country on mental health This is represented by the arrow in the outputs column. New partnerships, practises, and working relations are formed within Welsh Government and with partners. These improve the implementation of the Action Plan Publish a rapid review of and the continuation of its work available evidence on the impact of COVID-19 on LGBTQ+ LGBTQ+ people is published. Welsh public services recognise people. intersectional needs and are consistently safe, welcoming, inclusive, and empowering for LGBTQ+ people Undertake a thorough investigation into how LGBTQ+ people, particularly LGBTQ+ Wales is recognised as an young people and LGBTQ+ Key risks to be aware of LGBTQ+ friendly country by Put measures put in place to Evidence-based measures are disabled people, in Wales have LGBTQ+ people in Wales, in improve LGBTQ+ lives post put in-place to improve LGBTQ+ been impacted by the national and international media. lives after the pandemic. Coronavirus pandemic pandemic. and wider stakeholders

Assessment of data sources

- 3.20 Understanding the availability of quantitative data on the outputs, outcomes and impacts of the LGBTQ+ Action Plan is an important part of the evaluability assessment as it will determine the feasibility of using quantitative versus qualitative evaluation methods. It will also support the ongoing monitoring of the LGBTQ+ Action Plan and help determine how success should be measured.
- 3.21 Following a data review, a list of identified data sources to support the monitoring of the LGBTQ+ Action Plan (i.e. the Databank) has been developed. This 'Databank', detailed overleaf, is designed to provide a single point of reference to future evaluators on where quantitative data is available to support an evaluation. The table also provides recommendations to the Welsh Government on where and how data can be improved, where this is relatively feasible. These recommendations should be considered in advance of any future evaluation, to allow enough time for any changes in data collection activities to be developed. The columns indicating the 'Relevant Action' and 'Relevant Output or Outcome' indicate the most relevant elements of the Theory of Change and are designed to facilitate the use of the Theory of Change when evaluating the LGBTQ+ Action Plan for Wales.
- 3.22 The Databank rates identified data according to three levels based on the extent to which additional work could be required to improve the quality of data:
 - Data is readily available to evaluators the data is readily available for evaluators (e.g. via an official website) and has the necessary levels of detail that no further work is required. This category is shaded in green.
 - Data available but requires collation/analysis the data exists but it may require some work to access, collate and analyse findings such that it can be used in an evaluation. This category is shaded in yellow.
 - Further exploration and work required further exploration on the data is required to validate whether it is useful, and/or data collection may need to be amended to capture the right level of information before it can be used in an evaluation. This category is shaded in red.

Table 1: Databank – assessment of the quantitative data landscape

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
Theme A: Human Rights and Recognition	Banning conversion practices	Reduced number of LGBTQ+ people who experience conversion practices in Wales and improved access to services for survivors	N/A	The number of referrals to support services from Welsh public services. This was suggested by interviewees but were unsure if and how this data is consistently collected by support services or by public services.	Further exploration and work required. This data is not readily available and so will need to be explored further	Welsh Government would need to contact support services and/or public services to explore data further. If unavailable, some data may be accessible from Galop and Victim Support in Wales.
Theme A: Human Rights and Recognition	Strengthen LGBTQ+ representation on equality forums	LGBTQ+ people are supported by the Welsh Government and other public bodies in Wales – and feel that they are supported and Public services are designed to better serve LGBTQ+ people.	Welsh Government organisations (includes forums)	There are membership lists of all Welsh Government forums. If equality forums are identified by Welsh Government, evaluators could monitor the representation of LGBTQ+	Data available but requires collation/analysis Data is likely to be available to evaluators but requires Welsh Government to collate and/or make data available.	Welsh Government would need to collate and make available a list of equality forums that should inform the evaluation.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				organisations within these forums over time.		
Theme A: Human Rights and Recognition	Provide recognition of non-binary and intersex people	Non-binary identities are recognised in driving licenses, passports, and Welsh Government publications	LGBTQ+ Action Plan Progress Updates and documents provided by the Welsh Government's LGBTQ+ Policy Team	Monitoring whether the Welsh Government held meetings with the UK Government regarding the recognition of non-binary people on passports and driving licenses.	Data is expected to be readily available to evaluators	None.
Theme A: Human Rights and Recognition	Seek the devolution of powers in relation to gender recognition	Trans people are helped to obtain a GRC in Wales and Welsh Government support for trans communities is visible	LGBTQ+ Action Plan Progress Updates and General Register Office data on Gender Recognition Panel applications	Monitoring whether there have been progressive reforms to the Gender Recognition Act (GRA) and whether the Welsh Government held meetings with the UK Government regarding the devolution and/or reform of gender recognition.	Some data available, but General Register Officer data will require collation and analysis.	Welsh Government should seek data from the General Register Office on the number of people who apply for a Gender Recognition Certificate within Wales.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				Monitoring the number of applications (or another relevant indicator after reform the GRA) could be used to monitor the impact of devolution and reform the GRA in Wales.		
Theme A: Human Rights and Recognition	International engagement showcases our LGBTQ+ values	Wales is recognised globally as an LGBTQ+ friendly nation – and has a positive impact on LGBTQ+ rights abroad.	Welsh Government Overseas Network reports	The Welsh Government's Overseas Network reports could be used to inform the degree to which the Government and its partners have promoted LGBTQ+ issues abroad.	Data is expected to be readily available to evaluators	Welsh Government should have a greater focus on equalities issues in Overseas Network reports. Welsh Government should include a chapter dedicated to equalities issues.
Theme B: Safety and	Remove barriers to LGBTQ+ people	LGBTQ+ people are confident to report hate crime	N/A	It was suggested by an external interviewee that	Further exploration and work required It is unclear if this	Welsh Government and/or

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
Freedom from Discrimination	reporting hate crime	and trust that they will be listened to and Improved levels of reporting and recording of LGBTQ+ hate crimes		police forces collect data on the satisfaction of all hate crime victims with the reporting process and break this down by protected characteristics of hate crimes – i.e. crimes due to Sexual Orientation, and Transgender Status/Gender Identity.	data is readily available and would require further exploration to obtain the data and assess its usefulness	evaluators should request and if necessary, collate monitoring data on hate crimes by protected characteristics to inform the evaluation.
Theme B: Safety and Freedom from Discrimination	Remove barriers to LGBTQ+ people reporting hate crime	Improved levels of reporting and recording of LGBTQ+ hate crime	N/A	External interviewees believed that evidence of human rights being respected among the wider population could be seen through anti-LGBTQ+ hate crimes being reported more often by bystanders. It is	Further exploration and work required It is unclear if this data is readily available and would require further exploration to obtain the data and assess its usefulness	Welsh Government and/or evaluators should request this monitoring data to inform the evaluation.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				unclear if police forces collect this data. Please note: interviewees highlighted that the number of hate crimes and the number of reported hate crimes can vary widely (see paragraph 7.21 for details). In addition, quantitative data on hate crimes is particularly challenging to collect, meaning that interviewees recommended qualitative research should lead when evaluating this topic.		
Theme B: Safety and Freedom from Discrimination	Remove barriers to LGBTQ+ people reporting hate crime	Increased awareness of what anti-LGBTQ+ hate crimes and online	National Survey for Wales	An additional question in the National Survey for Wales could	Further exploration and work required. This would require an additional	Welsh Government should consider adding this

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
		hate are, the ways to report them, and how to receive support – including through the Wales Hate Support Centre		measure respondent's awareness of anti- LGBTQ+ hate crimes and the options available to report hate crime.	question in the National Survey for Wales.	question to the National Survey for Wales.
Theme B: Safety and Freedom from Discrimination	Remove barriers to LGBTQ+ people reporting hate crime	Increased awareness of what anti-LGBTQ+ hate crimes and online hate are, the ways to report them, and how to receive support – including through the Wales Hate Support Centre and Improved levels of reporting and recording of LGBTQ+ hate crime	N/A	Interviewees stated that the Wales Hate Support Centre currently record monitoring data regarding the number of LGBTQ+ referrals and their engagement with LGBTQ+ people, and the impact of their services for LGBTQ+ individuals.	Further exploration and work required Data is likely to be available to evaluators but requires Welsh Government to obtain and validate data	Welsh Government should request this monitoring data from the Wales Hate Support Centre. The quality of this data will need to be checked.
Theme B: Safety and Freedom from Discrimination	Remove barriers to LGBTQ+ people reporting hate crime and Improve the relationship of	LGBTQ+ communities feel confident to engage with law	N/A	LGBTQ+ representation among PCSOs and police officers, as found	Data available but requires collation/analysis.	Welsh Government should request this data from

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
	LGBTQ+ communities with Policing in Wales	enforcement services (Note also relevant Activity: Improve LGBTQ+ representation in the PCSO workforce)		in Welsh Government monitoring data on PCSOs and police force reports for police officers. Not all forces have this data readily available, but North Wales Police's Workforce Representation Reports are a good illustrative example.		Welsh police forces.
Theme B: Safety and Freedom from Discrimination	All actions	Fewer anti- LGBTQ+ hate crimes committed in Wales	Crime Survey for England and Wales	A survey of individuals in England and Wales to determine the level of crime, including unreported crime, and satisfaction with police responses. It includes questions and breakdowns	Further exploration and work required to access data on Welsh LGBTQ+ experiences	Welsh Government should ask for regional breakdowns by sexual orientation and gender identity compared to sex recorded at birth. Validating the quality of this data will also be

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				by demographic groups.		crucial, as low sample sizes are expected.
Theme B: Safety and Freedom from Discrimination	Target VAWDASV among LGBTQ+ communities.	Remove barriers for LGBTQ+ people reporting VAWDASV	Forthcoming	National VAWDASV indicators are being reviewed by Welsh Government, interviewees suggested that this could lead to more data being available at the time of the evaluation.	Further exploration and work required	Welsh Government officials working on LGBTQ+ policy should ask for updates on the outcome of this review and seek to ensure that LGBTQ+- specific indicators are available.
Theme C: A Nation of Sanctuary for Refugees and Asylum Seekers	Identify, safeguard and signpost LGBTQ+ people in claiming asylum	LGBTQ+ asylum seekers and refugees feel that the Welsh Government's commitments to making Wales a Nation of Sanctuary are inclusive of LGBTQ+ people	N/A	Interviewees suggested that the Wales Sanctuary Service monitor the satisfaction of asylum seekers with their services and wider experiences but that this is not currently broken	Further exploration and work required The data will need to be obtained and validated. The monitoring survey will also need to be amended.	Welsh Government should consider including a question of sexual orientation and gender identity in the Wales Sanctuary Service's satisfaction

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				down by sexual orientation or gender identity.		survey. The data will need to be obtained and validated. This may be complex considering asylum is not a devolved policy area.
Theme D: Health, Social Care, and Well- Being	Understand and improve the experience of LGBTQ+ people in the health and social care sectors.	LGBTQ+ people feel safe, respected, and understood when using health and social care services and LGBTQ+ people have improved access to healthcare services and a reduced risk of exclusion	N/A	External interviewees were optimistic that the number of LGBTQ+ people making complaints to health boards could be used in an evaluation. In the absence of this data being available, interviewees suggested that Llais – the Citizen's Voice Body for Health and Social Care could play a role	Further exploration and work required It is unclear if this data is available, it may require major Welsh Government work of collating and configuration to be made available to evaluators.	Welsh Government should seek to secure health complaints data on the number of complaints from people who identify as LGBTQ+. If this is not possible, they should seek the number of complaints which reference anti-LGBTQ+ discrimination in healthcare.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				in the evaluation, including through their patient experience reports.		
Theme D: Health, Social Care, and Well- Being	Understand and improve the experience of LGBTQ+ people in the health and social care sectors.	LGBTQ+ people feel safe, respected, and understood when using health and social care services and LGBTQ+ people have improved access to healthcare services and a reduced risk of exclusion		Interviewees believed that more rigorous collection of data regarding patient's sexual orientation and gender identity would be necessary to deepen understanding of LGBTQ+ experiences in healthcare.	Further exploration and work required.	Welsh public services - including the NHS - should more frequently collect data on service user's gender identities and sexual orientations in order to assess demand and identify any inequalities in service delivery. Data collection should be standardised and collected consistently.
Theme D: Health, Social Care, and Well- Being	Understand and improve the experience of LGBTQ+ people in	LGBTQ+ people feel safe, respected, and understood when	NHS Wales staff survey 2023 (results forthcoming)	The NHS Wales staff survey 2023 could be used to inform the	Further exploration and work required Unclear if the data is suitable for the	The data should be explored further to determine if

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
	the health and social care sectors.	using health and social care services and LGBTQ+ people have improved access to healthcare services and a reduced risk of exclusion		evaluation, by considering the experiences of LGBTQ+ staff working in healthcare. However, it is not clear if the survey asked individuals about their sexual orientation or gender identity – or if results could be filtered this way. This was not possible in previous staff surveys.	evaluation and so will need to be explore further, with the survey potentially requiring amendment.	questions relating to sexual orientation and gender identify should be added to the survey.
Theme D: Health, Social Care, and Well- Being	Understand and improve the experience of LGBTQ+ people in the health and social care sectors.	LGBTQ+ people feel safe, respected, and understood when using health and social care services and LGBTQ+ people have improved access to healthcare services	Potentially forthcoming report	Interviewees working in health stated that the Health Inspectorate Wales may include LGBTQ+ inclusivity in its annual report if there is strong data. They also	Further exploration and work required. A report and underlying dataset may be available to inform the evaluation.	None identified.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
		and a reduced risk of exclusion		suggested that Health Inspectorate Wales is considering conducting a review of health inequalities for trans people and this could form part of an evaluation.		
Theme D: Health, Social Care, and Well- Being	Ensure the development of the new mental health strategy takes account of LGBTQ+ people	LGBTQ+ people are confident that mental health services meet their needs	Forthcoming	Internal interviewees were confident that the Welsh Government's new mental health strategy will be formally evaluated, and that this would take into account LGBTQ+ experiences. This could inform this evaluation.	Data is expected to be readily available to evaluators – if an evaluation of the strategy is undertaken	None

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
Theme D: Health, Social Care, and Well- Being	Publish and act on a new HIV Action Plan	Wales meets the target of zero new HIV transmissions by 2030 and people living with HIV are satisfied with their care and LGBTQ+ people in all regions of Wales feel they can have easy, private, and confidential access to sexual health service	Forthcoming (Public Health Wales' HIV Wellbeing Survey)	As stated in Action 26 of the HIV Action plan, work is ongoing to survey the Well- being of people living with HIV in Wales. The first survey will be open in early 2024 and be repeated annually. It will ask individuals to input their sexual orientation and gender identity through open-text fields before asking a comprehensive series of questions on satisfaction, barriers, and well- being. In addition, further data is expected to be available regarding the zero HIV transmissions	Data is expected to be readily available to evaluators	None

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				target from Public Health Wales.		
Theme D: Health, Social Care, and Well- Being	Continue to develop the Wales Gender Service.	Trans and non-binary people –inc. children, young people, and adults – are confident the WGS and referral pathways meet their healthcare needs		Interviewees were highly confident that data from the WGS on waiting times, patient-reported outcome measures (PROMs), patient-reported experience measures (PREMs), and anonymised feedback from the monthly meetings held between the WGS and trans representatives could be made available to evaluators of the LGBTQ+ Action Plan.	Data available but requires collation/analysis.	Welsh Government and/or evaluators should request this monitoring data to inform the evaluation. Interviewees were highly confident that this data would be available.
Theme E: Inclusive Education	Provide national trans guidance for schools and local authorities and	Trans people feel safe, valued, and included in education and	School Health Research Network - Student Health	Internal interviewees believed that the effects of the	Further exploration and work required. This data could be made available to	Welsh Government should liaise with the School

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
	Design and implement a whole school approach that is fully LGBTQ+ inclusive.	LGBTQ+ young people report lower levels of bullying and discrimination	and Wellbeing in Wales	Guidance could be measured through the School Health Research Network Student Health and Wellbeing Survey by highlighting the experiences of trans and nonbinary students. It includes questions on cyber-bullying and violence in schools, which could be informative in an evaluation.	evaluators, but it would require changes to the survey.	Health Research Network to ensure that future Student Health and Wellbeing Surveys ask secondary school pupils questions about both sexual orientation and gender identity and make this data available to the evaluators of the LGBTQ+ Action Plan for Wales. Currently, the survey asks only for respondent's gender identity and does not collect data on sexual orientation or whether their gender identity is the same as their gender

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
						described at birth.
Theme F: Communities, Private and Family Life	All actions in this theme	Improve experiences – and connectivity – of LGBTQ+ people in all parts of Wales	National Survey for Wales (2019-2020) Variables: DvSexOrient and DvFGLonely.	The National Survey for Wales (2019-20) found that heterosexual people were much less lonely than non-heterosexual people. Surveys since the 2019-2020 survey have not reported the results with an LGBTQ+ breakdown for this question within the publicly-available Results Viewer.	Data available but requires collation/analysis. Data is available but will require further analysis to provide relevant breakdowns.	Please see the Recommendations on the National Survey for Wales at the end of this table.
Theme F: Communities, Private and Family Life	Support the family lives of LGBTQ+ people.	All family members feel confident on how to support their LGBTQ+ family members, including children and young people	N/A	The 'Parenting: Give it Time' campaign has new pages providing information for parents of LGBTQ+ children and for LGBTQ+	Data available but requires collation/analysis. Data is likely to be available to evaluators but requires Welsh Government to collate.	Welsh Government should provide this website analytics information to evaluators. To improve this data, Welsh

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				parents. The number of page visits is monitored and could be used in an evaluation. This source only captures if parents use a Welsh Government resource – meaning bespoke research might have to be conducted to evaluate whether all family members are confident in supporting LGBTQ+ family members.		Government should consider asking those visiting the webpage for feedback on their experience using the service.
Theme F: Communities, Private and Family Life	Provide support for LGBTQ+ people to participate in democracy, including standing for elected positions.	LGBTQ+ people are better represented in public life	Local Government Candidates Survey	The Local Government Candidates Survey asks candidates to feedback if they identify as lesbian, gay, or bisexual.	Further exploration and work required. Data for lesbian, gay, and bisexual candidates is expected to be readily available to evaluators.	Confidence in these figures depends upon response rates to the survey and sexual orientation questions.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
					To collect data for trans candidates would require a change to the survey.	The survey could be strengthened if it asked if people's gender identity is the same as the gender that was described at birth.
Theme G: Participation in Welsh Life - Culture and Sport	Improve the representation, inclusion, and participation of LGBTQ+ people in sports	LGBTQ+ community is better represented and accepted in both sport and culture sectors	National Survey for Wales (2019-2020) Variables: DvSexOrient and DvVolSport.	The National Survey for Wales (2019-20) found that heterosexual and nonheterosexual people were similarly likely to have volunteered in sport in the last 12 months. Surveys since the 2019-2020 survey have not reported the results with an LGBTQ+ breakdown for this question.	Data available but requires collation/analysis. Data is likely to be available to evaluators but requires Welsh Government to collate.	Please see the Recommendations on the National Survey for Wales at the end of this table.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
Theme G: Participation in Welsh Life - Culture and Sport	Improve the representation, inclusion, and participation of LGBTQ+ people in sports and Improve the access and participation of transgender people in sport.	More sporting bodies in Wales adopt transinclusive policies and these are implemented consistently and at all levels	Sporting National Governing bodies policies.	Reviewing the trans-inclusivity of National Governing Bodies' policies.	Further exploration and work required. This data is unlikely to be readily available and will require the Welsh Government to request the data and undertake analysis.	Collecting older policies will be difficult but are needed for comparison. The Welsh Government should collect a baseline of guidance as soon as possible, against which changes can be measured by evaluators.
Theme G: Participation in Welsh Life - Culture and Sport	Improve the representation, inclusion, and participation of LGBTQ+ people in sports and Improve the access and participation of transgender people in sport.	LGBTQ+ community is better represented and accepted in both sport and culture sectors	Sport Wales: Wales Activity Tracker	A series of surveys, run at different points of the year, provide a snapshot on physical activity and sport, as well as the attitude of people in Wales towards exercise.	Further exploration and work required Unclear if respondents are asked to indicate their gender identity or sexual orientation.	Welsh Government should discuss inclusion of questions regarding sexual orientation and gender identity in future versions of the surveys. Any historical surveys with data available by

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
						sexual orientation and gender identity should be made available to evaluators.
Theme G: Participation in Welsh Life - Culture and Sport	Celebrate and improve the representation of LGBTQ+ communities in the heritage and culture of Wales	LGBTQ+ culture and history are better represented in the cultural sector	Museums Spotlight Survey	The Museums Spotlight Survey provides data regarding the percentage of museums that have programmed activities or exhibitions relating to each protected characteristic.	Data is expected to be readily available to evaluators	None.
Theme G: Participation in Welsh Life - Culture and Sport	Celebrate and improve the representation of LGBTQ+ communities in the heritage and culture of Wales	Those involved in delivery of cultural services are engaged and aware of LGBTQ+ events and activities at local, regional, and national level and LGBTQ+ culture and history are better represented	Monitoring data and reports – Government- funded culture and sports organisations	Interviewees suggested that detailed monitoring data from Welsh Government- funded cultural organisations (Amgueddfa Cymru, the Arts Council of Wales, the National	Data available but requires collation/analysis. Data is likely to be available to evaluators but requires Welsh Government to collate.	Welsh Government and/or evaluators should request this monitoring data to inform the evaluation.

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
		in the cultural sector		Library of Wales, the Royal Commission on the Ancient and Historic Monuments of Wales, and Sport Wales) should be available to evaluators of the LGBTQ+ Action Plan. This could include the number of LGBTQ+ items displayed, exhibitions, and events. It may also include data on the number of people who visit LGBTQ+ exhibitions and events. In addition, LGBTQ+ breakdowns may be available upon request from the		

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				National Survey for Wales team.		
Theme H: Inclusive Workplaces	Provide equalities training that includes the needs of LGBTQ+ people to all public sector organisations and Encourage private sector employers to be LGBTQ+ inclusive	A decline in levels of reported LGBTQ+ discrimination in Welsh workplaces	National Survey for Wales (2019-2020) Variables: DvSexOrientWork Bul and WorkDisc.	The National Survey for Wales (2019-20) found that non-heterosexual people were much more likely to experience discrimination and bullying at work than their heterosexual peers. Surveys since the 2019-2020 survey have not reported the results with an LGBTQ+ breakdown for this question.	Data available but requires collation/analysis. Data is available but will require further analysis to provide relevant breakdowns	Please see the Recommendations on the National Survey for Wales at the end of this table.
			the National Survey orientation, it is no publicly available in request breakdown	for the National Surve for Wales asks individ ted that this data is r results reports. Evalus s which are not alread ey's 'Results Viewer'	uals on their sexual not reported in the lators are able to y publicly-available	

Theme	Relevant Action	Most relevant intermediary outcome or output	Link to data source	Description of proposed data source	Data assessment	Recommendati on(s)
				breakdowns would	ional Survey for Wa d then be publishe r, they should be awar using this data.	ed, sample sizes
				categories of "het break-down data bu recommended tha provide breakdown previous survey ite any historical trends of reporting against sizes. It is there Government cons through targeted	O survey, results purerosexual" and "nor ut did not include further existing data is argued as a second of the contractions where this is partions where this is partions where this is recognized as a recommended of the contractions oversampling recruitment strated is area in future survey	n-heterosexual" to er breakdowns. It is nalysed further to ups, ideally for all cossible to identify inised that the lack esult of low sample that the Welsh LGBTQ+ groups gies to improve

Summary of assessment of data sources

- 3.23 In summary, the availability of quantitative evidence that can be used to confidently measure the impact of the LGBTQ+ Action Plan is limited. Sources that can measure whether the LGBTQ+ Action Plan's overarching vision 'to make Wales the most LGBTQ+ friendly nation in Europe' has been achieved are not readily available.
- 3.24 Welsh Government is in discussion with ILGA-Europe asking for Wales to be recognised in ILGA-Europe's (2024) Rainbow Map, which provides a rating of countries in terms of how LGBTQ+ friendly they are. Wales is currently not represented in the Rainbow Map and it is not within the Welsh Government's direct power to change this. Many stakeholders highlighted that this vision's focus on Welsh performance relative to other European countries does not centre the Welsh experience. In extreme cases, even if LGBTQ+ friendliness does not change in Wales but is reduced across the rest of Europe – the plan could "succeed" without LGBTQ+ lives improving in Wales. This vision should be amended to become SMART (specific, measurable, achievable, relevant, timebound) if it is to be used to measure success in an impact assessment. An overarching SMART vision should be decided by policymakers in wide consultation with the LGBTQ+ community. One example key vision is that the proportion of the Welsh LGBTQ+ population which reports loneliness in the National Survey for Wales reduces to the same level as non-LGBTQ+ people by a specified year.
- 3.25 Data which captures the lived experiences and attitudes of LGBTQ+ people in Wales over time is not collected systematically in sufficient detail to be used to evaluate the success of the LGBTQ+ Action Plan. As can be seen in the Databank, the National Survey for Wales only provides breakdowns for the LGBTQ+ community as a homogenous group and even then only on loneliness, sports participation, and workplace discrimination although more data may be available at the time of the evaluation and upon request from the administers of the National Survey for Wales. As discussed during the stakeholder interviews, being able to improve the lived experiences of all LGBTQ+ people including people with intersecting identities is critical to the objectives of the LGBTQ+ Action Plan and its emphasis on intersectionality should be a core component of any future evaluation. Furthermore, there is even less quantitative data available which can reflect the experiences of LGBTQ+ people with additional protected

- characteristics such as LGBTQ+ refugees, disabled LGBTQ+ people, and black LGBTQ+ people. These findings will be considered further in the evaluability assessment.
- 3.26 Some quantitative indicators exist that can evidence specific themes within the LGBTQ+ Action Plan, although many of these datasets require improvements before they can be used to evaluate the LGBTQ+ Action Plan and its implementation. This includes ensuring that relevant LGBTQ+ breakdowns are available and account for intersectionality, improving the way in which the data is readily available. In some cases, data relating to satisfaction and complaints exists on the experiences of LGBTQ+ people interacting with public services, such as for Themes B, C, D and E. However, such data is currently not readily available to Welsh Government officials working on the LGBTQ+ Action Plan and will require further action to collate the data.
- 3.27 Finally, as some stakeholders noted, the use of quantitative data should be used with caution given that stakeholders viewed such metrics as likely to oversimplify the complexities of the LGBTQ+ Action Plan and intersectionality.
- 3.28 Given these issues, the use of quantitative data in a future evaluation will be limited, even if data collection was improved as outlined in the Databank. Where quantitative data is used, it should be used with caution to ensure that it does not oversimplify the varied and intersectional experiences of LGBTQ+ people.

Implications for the process evaluation

- 3.29 A process evaluation seeks to evaluate how and why the implementation of a programme or intervention is or isn't working. This can be used to further improve how the programme is delivered and ultimately the impact it may have. The process evaluation for the LGBTQ+ Action Plan could cover the following areas, however the specific research questions should reflect those which Welsh Government will find most helpful at the time of the evaluation:
 - Programme delivery: the degree to which the LGBTQ+ Action Plan was
 implemented as intended and the extent to which relevant stakeholders have
 the necessary information and resources to do so. This will focus on the
 extent to which action owners have an understanding of the LGBTQ+ Action
 Plan and the extent to which they have completed their actions. This may

- also include understanding the extent to which action owners could do so, both in terms of devolved legislative powers and availability of resources.
- Audience: the extent to which the LGBTQ+ Action Plan reaches its intended
 audiences and how this might need to be improved. A process evaluation
 could consider the extent to which LGBTQ+ people including those with
 intersectional identities feel represented by the LGBTQ+ Action Plan,
 included in its work, and believe it is making a difference to their lives. A
 crucial finding of this would be more information on how to further strengthen
 the representation of the LGBTQ+ community in future LGBTQ+
 policymaking and evaluation.
- Stakeholder engagement: the extent to which stakeholders were able to
 engage with the LGBTQ+ Action Plan to provide feedback and input. This
 information can be used to help refine similar interventions going forward.,
 This is particularly important given the importance of stakeholder
 engagement in the development and support of the LGBTQ+ Action Plan.
 This should include the suitability of existing structures and processes in
 place to reflect the views and suggestions of stakeholders in the LGBTQ+
 Action Plan.
- Data and monitoring: whether there is sufficient data collection to monitor the progress associated with implementation, as well as key outputs and outcomes that can support an impact evaluation. This will include existing processes to monitor the completion of the actions stated in the LGBTQ+ Action Plan, as well as structures to collect, collate and learn from data that could inform both the impact evaluation and any improvements to the LGBTQ+ Action Plan going forward.
- Learning lessons: the extent to which there is a process for learning lessons from implementation of the LGBTQ+ Action Plan. An important output of the process evaluation would be recommendations on how the implementation and effectiveness of the LGBTQ+ Action Plan can be improved.
- 3.30 Process evaluations are typically mixed methods, using quantitative data to measure progress of implementation and qualitative information gathering from fieldwork to understand action owners' and stakeholders' views on how implementation can be improved and what lessons can be learned. Given the

implementation of the LGBTQ+ Action Plan relates to whether actions have been completed or not, it is recommended that this becomes the main metric for measuring delivery of the LGBTQ+ Action Plan's implementation. Fieldwork can be used to determine any potential challenges, barriers or lessons that could help improve the completion of actions going forward. Interviews should be conducted with both Welsh Government and non-Welsh Government stakeholders – including the Welsh Gender Service, health boards, WHHSC, Estyn, Unique Transgender Network, Stonewall, trade unions, and local authorities – to evaluate existing processes and structures relating to stakeholder engagement and decision making.

3.31 An outline of approach to the process evaluation, including research questions and timings is provided, in section 4.

Assessment of options for the impact evaluation

3.32 This section discusses the assessment of impact evaluation options used to arrive at the preferred evaluation approach, using the findings gained from research activities.

Evaluation options longlist

- 3.33 The longlist of options are taken from the Magenta Book, in line with best practice. The longlist identifies three broad categories of evaluation options experimental techniques, quasi-experimental techniques, and theory-based (qualitative) methods. These categories help avoid repetitive statements about specific techniques. In the shortlist, more detailed assessments will be made for specific evaluation methods.
- 3.34 The three evaluation groups in the longlist are as follows.
 - Experimental techniques. These are designs that involve the random
 assignment of participants to treatment and control groups to assess the
 causal impact of an intervention or treatment, such as randomised control
 trials (RCTs). Experimental designs are considered the gold standard for
 establishing causal relationships because random assignment helps control
 for potential confounding variables.

- Quasi-experimental techniques. Quasi-experimental techniques are largely
 quantitative techniques which seek to estimate the causal impact of an
 intervention or treatment when a randomized controlled trial (RCT) is not
 feasible or ethical. While not as rigorous as true experimental designs, quasiexperimental methods attempt to control for confounding variables and
 approximate the conditions of an experiment to make causal inferences.
- Theory-based (qualitative) methods. These approaches tend to use qualitative and mixed-methods insights to understand why and how an intervention has worked. It is typically used in the absence of enough quantitative evidence to conduct quasi-experimental or experimental methods. Theory-based methods are useful for understanding nuances and the experiences of different impacted groups of people. However, they are generally unable to determine causality given the absence of randomisation and they rely on developing theories and assumptions on how outcomes arise from the intervention, which may not always be well evidenced or measurable.

Assessment of the longlist

3.35 The list below details the assessment criteria used to assess the suitability of evaluation options for this evaluability assessment. This set of criteria was produced on key dimensions that were deemed important for the choice of evaluation based on stakeholder feedback and was agreed with the Welsh Government. This set of criteria was used for both the longlist assessment and shortlist assessment.

Robustness

3.36 The extent to which impacts can be quantified and causally attributable to the programme. The design of the LGBTQ+ Action Plan itself may limit what is achievable (e.g. absence of a counterfactual). There is likely to be a trade-off between robustness, resource requirements and the need to understand the complexities of programme's impacts.

Scope of impacts and groups captured

3.37 An evaluation methodology will be more advantageous if it measures the full range of impacts generated by a programme, including for specific population groups of interest. However, some methodologies may lend themselves to only capturing some impacts in more or less detail, depending on the nature of the programme in question.

The interviews with Welsh Government officials and external organisations emphasised the importance of capturing the lived experiences of LGBTQ+ people in the evaluation. Further, capturing intersectionality of LGBTQ+ experiences was seen as a critical factor in the choice of evaluation, which has implications for both the choice of type of information collected and how impact and success are determined.

Any chosen evaluation approach will need to ensure representation of intersectional experiences, which may be more or less feasible for certain methodologies.

Data availability

3.38 Different methodologies will place different requirements on data, both in terms of what has already been collected and what may need to be collected as part of a future evaluation. These requirements will need to be balanced with what is available and feasible in relation to the LGBTQ+ Action Plan.

The emphasis on capturing the lived experiences of LGBTQ+ people and representation of intersectionality would suggest a greater focus on qualitative fieldwork.

Resourcing requirements

3.39 This considers the feasibility of different evaluation approaches dependent on available resources. Committed resources should be proportionate to the scale of the intervention. This will be determined by Welsh Government.

Stakeholder engagement

3.40 This criterion will assess the extent to which the amount of stakeholder engagement and access is required to undertake the methodology is likely to be

both warranted and feasible based on our understanding of the LGBTQ+ Action Plan and priorities. Stakeholders emphasised the importance of the LGBTQ+ Action Plan to consider the varied views and experiences of LGBTQ+ people, accounting for intersectionality, which suggests a highly inclusive and participatory approach.

Ethical considerations

- 3.41 Involvement of potentially vulnerable groups may present ethical concerns, which should be considered in the evaluation design. For example, the interviewees suggested a focus on understanding the perceptions and intersectional experiences of LGBTQ+ people, which could involve discussing sensitive topics which would require appropriate safeguards in place to mitigate harms to both the interviewer and interviewee.
- 3.42 The three evaluation groups were assessed using the above assessment criteria, using the information gathered from the interviews, literature review and scoping exercise. Experimental and quasi-experimental methods are ruled-out as suitable options, while theory-based methods are broadly deemed as suitable for further assessment at the shortlisting stage because:
 - There is a clear emphasis on understanding the lived experiences and perspectives of LGBTQ+ people, which cannot be captured by experimental and quasi-experimental approaches.
 - The LGBTQ+ Action Plan is highly complex. Quantitative methods alone
 would be unable to explore the complexities and nuances of impacts
 meaningfully. Theory-based approaches allow enough flexibility for
 considering such complexities and potential changes to the LGBTQ+ Action
 Plan going forward.
 - There is a lack of available data that would allow pure quantitative methods to be used, without risking oversimplification of complexities and the diverse experiences of LGBTQ+ people. Theory-based approaches are flexible in their use of quantitative data and would therefore be more appropriate.
- 3.43 Further rationale on the assessment is as follows: Quasi experimental methods are similar to experimental methods and use quantitative data to establish impact of an intervention through creating artificial control groups and/or establishing a

counterfactual. Creating an artificial control group or suitable counterfactual would not be feasible for the evaluation of the LGBTQ+ Action Plan and using quantitative only measures would not capture the diverse and intersectional experiences of LGBTQ+ people. Theory-based approaches however use both quantitative and qualitative approaches ('mixed methods'). Due to the complex and not always prescriptive nature of the LGBTQ+ Action Plan, it is recommended that a future evaluation of the LGBTQ+ Action Plan should focus on theory-based approaches.

The options shortlist for the impact evaluation

- 3.44 Following the longlist assessment, a selection of theory-based evaluation methods are to be taken forward to the shortlisting stage for further assessment. The theory-based approaches in the Magenta Book are realist evaluation, process tracing, contribution analysis, outcome harvesting, most significant change, Qualitative Comparative Analysis, contribution tracing, and Bayesian updating.
- 3.45 The approaches taken forward to the shortlist assessment are realist evaluation, process tracing, contribution analysis, outcome harvesting, and most significant change.
- 3.46 As stated above, the following theory-based evaluation methods are to be taken forward to the shortlisting stage for further assessment. These theory-based approaches are taken from the Magenta Book and are described in Annex C.
- 3.47 Not all theory-based methods in the Magenta Book are suitable for an evaluation of the LGBTQ+ Action Plan for Wales. These methods tend to rely too heavily on quantitative evidence for this project's data availabilities or require unsuitable levels of stakeholder engagement. Brief descriptions of these methods and their unsuitability to this evaluation are provided in Annex C:

Shortlist assessment of impact evaluation options

This section summarises the assessment of the shortlist presented in the previous subsection, using the same criteria applied at the longlisting assessment stage.

The key output of the shortlist assessment is the recommended evaluation option.

Process tracing

3.48 Process tracing provides detailed assessment of the causal mechanisms defined in the Theory of Change to test causality. Its results can be used to understand

why something has or has not worked at a granular level. For this reason, it can be useful for understanding causality and impact in detail, as well as understanding potential operational challenges of an intervention which can support the process evaluation. However, process tracing requires a large amount in-depth interviews to qualitatively validate each linkage in the Theory of Change. Using this approach for the LGBTQ+ Action Plan would therefore require large amount of resource and would likely be infeasible. Process tracing requires a good level of engagement from stakeholders who have a detailed knowledge about the impacts of the LGBTQ+ Action Plan. While the fieldwork has demonstrated generally good engagement from stakeholders, this places additional dependencies on stakeholders understanding of the LGBTQ+ Action Plan and their willingness to engage, which cannot always be guaranteed. For these reasons, process tracing is ruled out as an option to evaluate the LGBTQ+ Action Plan, however it could be a useful tool for evaluating individual projects or interventions.

Contribution analysis

3.49 Contribution analysis will provide a detailed assessment of causal mechanisms as defined in the Theory of Change and will rule out explanations that seem less credible. It also encourages the use of mixed-methods and quantitative data where available to assess the contribution of causal mechanisms to explain any observed quantitative outcomes. However, like process tracing, this approach is likely to be highly resource intensive and not feasible for a programme on the scale of the LGBTQ+ Action Plan. Given contribution analysis will also place greater emphasis on the measurement of quantitative outcomes and ruling out 'less credible' outcomes, this could result in the oversimplification of the LGBTQ+ Action Plan's complexities and the impact on marginalised communities. For these reasons, it is concluded that contribution analysis would not be appropriate for evaluating the LGBTQ+ Action Plan

Realist evaluation

3.50 Realist evaluations are ideal for evaluating complex interventions and could be useful for understanding why the LGBTQ+ Action Plan improves outcomes for some groups and not others, and in what contexts. It also does not prescribe a specific type of evidence to be collected, making it suitable for the LGBTQ+ Action Plan which is likely to rely on mixed methods data. A realist evaluation approach can require intense resources and engagement from stakeholders to understand and assess the interactions between actors, interventions and contexts, however

these resource requirements could be scaled-down by adopting an approach in which the principles of realist evaluation are taken forward along with a mixed-methods approach. Further, realist evaluations will seek to understand why the LGBTQ+ Action Plan has had impact in some contexts and not others, making it ideal to capture differing impacts across the diversity of LGBTQ+ experiences in Wales, including intersectional experiences.

Outcome harvesting

Outcome harvesting can be useful for focussing on understanding why observed outcomes and impacts have arisen and does not necessarily rely on the availability of quantitative information. It can also identify outcomes that were not anticipated by the Theory of Change. However, it requires a large amount of engagement and expertise from stakeholders who were involved in creating the outcomes to identify the observed outcomes and explain how and why they were generated. This makes process tracing highly participatory, the required level of which cannot always be guaranteed. There is also a risk that a focus on observed outcomes which are reported by stakeholders, may not highlight intersectional experiences and other key details which are crucial for an evaluation of the LGBTQ+ Action Plan.

Most significant change

3.52 This approach will help to identify how the LGBTQ+ Action Plan has had the biggest impact, which could be useful for describing impacts to external stakeholders. However, considering that it requires stakeholders to agree on which accounts of change are the most important, it may lead to the oversimplification of impacts and not reflect intersectional experiences. There is also a risk that it will be influenced by vocal groups and bias, which can influence the results. It is highly participatory and resource intensive, as it requires iterative engagement from stakeholders to determine which is most significant – this level of engagement cannot always be guaranteed. Lastly, most significant change's main focus is to determine which change is the most significant, but it does not necessarily seek to understand how or why these changes happen. There is also no clear role for understanding the lived, intersectional experiences of LGBTQ+ people. For these reasons, this approach is concluded as not being appropriate for the evaluation of the LGBTQ+ Action Plan.

3.53 The results of the shortlisting assessment and recommended evaluation option were presented to the Welsh Government for feedback and review.

Recommended approach for the impact evaluation

- 3.54 It is recommended that the impact evaluation of the LGBTQ+ Action Plan uses a mixed-methods realist evaluation. The principles of a realist evaluation approach should be flexibly applied to mitigate potential drawbacks of a pure realist approach (discussed further on).
- 3.55 A realist evaluation is useful for understand what 'what works in which circumstances and for whom,' making it useful for the impact and process evaluation, as well as capturing intersectional impacts. It is also not overly reliant on iterative stakeholder engagement or quantitative data, making it a more flexible approach than the other theory-based approaches.
- 3.56 The approach can be scaled relatively easily to suit the level of information required and resource availability, while still producing some useful results. This is contrary to other methodologies, such as outcomes harvesting and most significant change, which will not produce any useful results until the entire process is complete, making the resource requirements of such approaches more uncertain and harder to limit.
- 3.57 However, there are several limitations with a realist approach which suggests a flexible approach is needed in this case. A pure realist evaluation approach will require stakeholders to identify, develop and test a list of context-mechanisms-outcomes (CMO) hypotheses which essentially list theories on why and how the interventions are expected to work for some people and not others, and what changes in outcomes are expected if the intervention does work. This process can be resource-intensive and difficult for the LGBTQ+ Action Plan, which is particularly complex and is composed of many policies and interventions. It also places a particular dependency on stakeholders' understanding of the LGBTQ+ Action Plan which cannot always be guaranteed. In recognition of these limitations, the key questions of a realist approach should be adopted in the fieldwork but the listing and assessments of the CMOs could draw on the Theory of Change in Section 3, with stakeholders being asked to consider evidence that explains, supports, or contradicts the causal mechanisms and outcomes within it.

Implications for an economic evaluation

- 3.58 An economic evaluation seeks to determine whether a programme or intervention achieves 'value for money' for the taxpayer. In other words, this will consider whether the public funds invested in the programme or intervention is outweighed by the benefits it brings to society.
- 3.59 In practice, assessment of value for money involves comparing the costs of the programme with the benefits of the programme which are quantified and monetised, through a process called cost-benefit analysis. Examples of benefits that are typically quantified and monetised include cost savings and efficiencies to the public sector from interventions that reduce service usage; associated health and wellbeing benefits to individuals; economic productivity benefits (such as gross value added); and employment benefits in terms of increased earnings. A programme in which the total quantified benefits outweigh the costs is deemed to have achieved 'value for money'.
- 3.60 However, being able to appraise costs and benefits in this way for an economic evaluation requires availability of data on outcomes that are readily quantifiable and monetizable. In many cases, this may not always be possible or feasible, in which case the economic evaluation will not be possible.
- 3.61 In light of findings that qualitative and theory-based evaluation methods are best suited to evaluate the LGBTQ+ Action Plan, a value for money appraisal is neither feasible nor suitable in this circumstance. This is based on the following rationale:

Theoretical possibility

- 3.62 Value for money appraisal should be considered if there is theoretical rationale to believe that a programme will generate outcomes and impacts that are likely to be quantifiable and monetisable. These are usually identified in a Theory of Change and/or logic models based on the outcomes columns.
- 3.63 Many of the Outcomes and Impacts in the Theory of Change for the LGBTQ+
 Action Plan are not obviously quantifiable. For example, many relate to improving
 the lived experiences and lives of LGBTQ+ people, which will largely rely on
 understanding the perception of people through qualitative fieldwork and
 discussion which are qualitative by nature.

3.64 The Databank lists key outputs which could be quantitatively expressed, however in most cases it is not immediately clear how these metrics could be monetised relatively robustly (e.g. in terms of health outcomes, public sector cost savings and employment outcomes).

Availability of data and evidence

- 3.65 There is a lack of quantitative data on attitudes, experiences and wellbeing of LGBTQ+ people. The findings from the data assessment suggests that quantitative data should be use cautiously given it is highly limited in some places and may not capture the complexities of the LGBTQ+ Action Plan and the experiences of LGBTQ+ people.
- 3.66 Given the role of the LGBTQ+ Action Plan in improving the wellbeing of LGBTQ+ people, collecting data and monetising wellbeing impacts could be a possibility. However, being able to attribute causality of any changes to wellbeing to the LGBTQ+ Action Plan will be difficult if not impossible.

Strategic objectives

3.67 A consistent view from the interviews with the Welsh Government and external organisations was that the success of the LGBTQ+ Action Plan should not focus on quantitative measures, recognising the importance of the programme to improve the lives and lived experiences of LGBTQ+ people which are not necessarily captured in quantitative measures, which may also oversimply the intersectional experiences of LGBTQ+ people. Given this, even if better quantitative data becomes available, it may not be advisable to conduct an economic evaluation.

4. Conclusion and recommendations: Approach to the evaluation

- 4.1 This evaluability assessment recommends that a mixed-methods process evaluation and theory-based realist impact evaluation are undertaken for the LGBTQ+ action plan.
- 4.2 The broad, key stages of this evaluation approach are as follows. The evaluability assessment has already started the initial steps, specifically the first two bullet points below, meaning that the evaluation should consolidate and build on this work.
 - Through widespread stakeholder engagement, identify shared definitions of success, the outcomes which are expected to change, and the external factors.
 - Develop a Theory of Change which clarifies actions, activities, outputs, outcomes, the overall vision, feedback loops, risks, and assumptions.

Process evaluation:

- Gather and collate existing evidence, including quantitative data described in the Databank. Update the Theory of Change if necessary.
- Consider ethical concerns and undergo an ethics approval.
- Conduct fieldwork, likely a survey and interviews or focus groups with both Welsh Government officials and external stakeholders, to answer the example research questions in section 4.4.
- Analyse the qualitative and quantitative data.

• Impact evaluation:

- Gather and collate existing evidence, including quantitative data described in the Databank. Update the Theory of Change if necessary.
- Consider ethical concerns and undergo an ethics approval.
- Conduct fieldwork, likely a survey and interviews or focus groups with both Welsh Government officials and external stakeholders, to answer the example research questions in section 4.10 and evaluate the causal mechanisms within the Theory of Change.

o Analyse the qualitative and quantitative data, using realist principles.

Process evaluation

- 4.3 A mixed methods process evaluation is recommended which covers the following research questions, with qualitative fieldwork as described in paragraph 4.9:
- 4.4 Examples of process evaluation research questions are detailed below:

Delivery of the LGBTQ+ Action Plan

- To what extent have the actions been completed?
- Do action owners have the right level of information, resource, and support to complete their actions?
- Do action owners believe the Action Plan is important to their work?
- Are there any barriers or constraints to the delivery of key actions?

Data and monitoring

- What processes are in place to monitor the progress of the completion of the actions and support action owners to do so?
- Is data being sufficiently collected to measure the impact of the LGBTQ+ Action Plan, such as through an impact evaluation? See the impact evaluation section for further detail on what this could look like.
- Is there consensus among stakeholders about what success looks like and how this should be defined with available data?

Governance and engagement

- Is there a clear governance structure in place who are responsible for the development, implementation and ongoing decisions relating to the LGBTQ+ Action Plan?
- Are sufficient structures in place to coordinate workstreams involved in the delivery and evaluation of the LGBTQ+ Action Plan, including monitoring progress, data collection and evaluation planning? Is coordination and

- delivery as effective between the Welsh Government and external action owners as they are within the Welsh Government?
- Is there a clear and open process for engaging with external stakeholders and considering their views?

Learning lessons

- Is there a clear process in place to implement any lessons learned, both resulting from the process evaluation and those identified on an ongoing basis?
- Are there any feedback loops in place to capture any issues or feedback experienced by action owners and stakeholders?
- Is there an agreed process for refining and updating the LGBTQ+ Action Plan?
- 4.5 The primary metric for measuring progress of the LGBTQ+ Action Plan's implementation will be the extent to which actions have been completed. Fieldwork with more detail on the fieldwork options detailed below can be used to explore in detail any potential challenges, barriers or lessons relating to how action owners are able to complete their actions. In addition, interviews should be conducted with both the Welsh Government and external action owners such as the Welsh Gender Service, Estyn, and Wales TUC to evaluate existing processes and structures relating to collaboration and partnership between internal and external action owners.
- 4.6 In certain policy areas, fieldwork for the evaluation of the LGBTQ+ Action Plan and evaluations of other equalities plans such as the Anti-Racist Wales Action Plan could be combined. Workshops between action owners of different plans in similar policy areas could uncover best practices in specific policy areas, such as tackling hate crimes and health inequalities.
- 4.7 Based on the findings in this evaluability assessment, several potential challenges should be mitigated when planning a process evaluation:
 - Maintaining focus of interviews: At the process evaluation stage interviews should remain focused and targeted; they should not seek to either replicate the impact evaluation or become a general commentary on policy choice. To mitigate the risk of this, the purpose of the interview should be clearly communicated and discussion guides carefully tailored. In addition,

- stakeholders could be aware of channels to communicate their more wideranging views.
- Selection bias of recruitment: the recruitment during the fieldwork stage of this evaluability assessment found most stakeholders engaged positively with fieldwork. If it is observed that stakeholders who are not engaged in the fieldwork are also looking after actions where implementation requires further development, then failing to engage with such groups could bias the results of the process implementation. Such stakeholders should be encouraged to engage with the evaluation to understand whether they face any potential challenges or barriers to either completing their actions or engaging with the LGBTQ+ Action Plan more generally.
- Quantitative data: while this evaluability assessment has identified limited opportunities to use existing quantitative data, it is recognised that quantitative data can still be useful to supporting future evaluation work if improved. The Databank provides recommendations on how data collection could be improved or enhanced. The process evaluation should revisit the assessment of the availability of quantitative evidence, and what further gaps can be easily filled, in case improvements are made following this evaluability assessment.

Impact evaluation

- 4.8 It is recommended that the impact evaluation uses a mixed methods realist evaluation approach. A realist evaluation is useful for understanding 'what works in which circumstances and for whom,' making it particularly useful for the impact evaluation, as well as capturing the impacts on intersectional experiences. However, in order to keep demands on stakeholder time to a minimum the principles of realist evaluation should be flexibly to mitigate the more intensive demands of pure realist approaches.
- 4.9 The impact evaluation should engage Welsh Government officials and members of the LGBTQ+ community, including members of the LGBTQ+ people who have experience of intersectionality, to understand the impact of the LGBTQ+ Action Plan. Welsh Government officials will provide useful insight into the impact of the LGBTQ+ Action Plan on the Welsh Government itself into the longer-term, notably how it considers LGBTQ+ issues in the delivery of policy and policymaking process. Understanding the views and lived experiences of LGBTQ+ groups and

people will provide insight into how the LGBTQ+ Action Plan may have a positive impact on their lives and ultimately achieve the LGBTQ+ Action Plan's objectives of making Wales LGBTQ+ friendly. Noting these differences in purposes of engagement across different groups, the following list contains example research questions that should be considered for each group of stakeholders. To recruit participants outside of formal LGBTQ+ organisations and stakeholder groups, the approach of recruiting through LGBTQ+ community centres and venues should be considered (Chakraborti and Hardy, 2015).

4.10 Examples of impact evaluation research questions are detailed below:

Welsh Government

- What has been the impact of the LGBTQ+ Action Plan in achieving the actions under each Theme?
- How has the LGBTQ+ Action Plan been helpful in achieving these Actions?
- How has the completion of these actions improved the lives of LGBTQ+ people and ultimately achieve the aims of the LGBTQ+ Action Plan in making Wales LGBTQ+ friendly?
- How could the impact of the action plan be improved?

LGBTQ+ people, groups and organisations

- Based on your personal experience, would you describe Wales as an LGBTQ+ friendly place? Why, or why not?
- How do you think the achievements of the AP have made Wales a more LGBTQ+ friendly place?
- Are there areas which the LGBTQ+ Action Plan had gaps in terms of generating positive impacts for the LGBTQ+ community or groups within the community?
- Are there any specific actions or achievements from the action plan which you think has been important to achieving this?
- Have you noticed impacts from the LGBTQ+ Action Plan in your day-to-day life?

- What more could be done to make Wales more LGBTQ+ friendly? How could the LGBTQ+ Action Plan be improved?
- 4.11 In applying realist evaluation principles, interviews with Welsh Government officials and LGBTQ+ organisations who are knowledgeable of specific themes and actions should also discuss their views on the potential output, outcomes and impact of completed actions, including the specific mechanisms by which this impact arises and whether there could be any differences across specific groups of people (i.e. validate the Context-Mechanism-Outcome chains defined by the Theory of Change).

Approach to information gathering

- 4.12 It is recommended that the evaluation uses the following research tools to collect information for the evaluation:
 - Interviews: By the nature of the evaluation, the majority of the information
 collection activities will be qualitative and collected through interview. Given
 the potential sensitive nature of interviews, fieldwork with external
 stakeholders should be limited to one-to-one interviews. To reach all
 communities, translators should be employed as needed.
 - Focus groups: Focus groups are likely to be more appropriate for Welsh
 Government officials when discussing their experiences of implementing the
 LGBTQ+ Action Plan, as they allow evaluators to test the weight of differing
 opinions, thus discerning how representative different opinions are.
 Discussion guides should be produced sensitively, and any officials wishing
 to engage with the evaluation in one-to-one interviews should be
 accommodated.
 - Survey of LGBTQ+ people: a survey could be useful for engaging with LGBTQ+ people who may not feel comfortable engaging through interview, while also maximising the reach and sample size of the evaluation. The survey could also systematically record the attitudes of LGBTQ+ people on the extent to which Wales is LGBTQ+ friendly, which can enhance the availability of qualitative and quantitative information in this area and allow comparison across time and tabulation across additional characteristics,

providing some indication of the role intersectionality in LGBTQ+ experiences. This survey should use a range of recruitment methods to maximise its scale and reach of LGBTQ+ people across Wales.. If possible, it this survey should be conducted as soon as possible, to provide a near-baseline view of current perceptions, and then be repeated during the impact evaluation to understand how perceptions have changed. This survey could also be repeated prior to any refresh of the LGBTQ+ Action Plan.

- Survey of Welsh Government officials: As discussed in the literature review, a survey of Welsh Government officials could provide insight on the status of actions, perceived impacts, and the degree to which officials view the LGBTQ+ Action Plan as influencing their work.
- Existing quantitative data: It is recommended that existing quantitative data is used as supporting evidence to the evaluation to determine important changes in outputs, outcomes and impacts. The use of existing quantitative data should be used in conjunction with findings from the fieldwork including any new quantitative data produced by a survey of LGBTQ+ people to determine impact of the LGBTQ+ Action Plan in a holistic sense.

Determining the overall success of the LGBTQ+ Action Plan

4.13 The success of the LGBTQ+ Action Plan is currently defined as meeting its stated goal of "making Wales the most LGBTQ+ friendly nation in Europe". However, there are currently no datasets that exist which can measure this objective, therefore making it unsuitable to use this stated goal as a definition of success for the impact evaluation. Achieving this objective is also not fully within the control of the Welsh Government. As a result, this objective should be revised (or different objectives are created) and be made SMART (specific, measurable, achievable, relevant, time-bound) if they are to be used to measure success in an impact assessment.

Objectives should reflect the emphasis of the LGBTQ+ Action Plan on improving the lives and experiences of all LGBTQ+ people. Given issues with oversimplifying the complexities of the LGBTQ+ Action Plan and varied intersectional experiences of LGBTQ+ people, overall success should be judged on a holistic combination of quantitative and qualitative data based on experiences and perceptions.

Potential challenges to the impact evaluation

- Maintaining focus of fieldwork: As discussed, there is likely to be interest
 from external stakeholders to engage with the research. The objectives and
 research questions of the fieldwork should be stated clearly to avoid
 discussion that are beyond the scope of the work. Stakeholders noted there
 being a risk that the evaluation fieldwork is used as an opportunity for some
 stakeholders to provide views on policy and for activism purposes.
- Engagement and expertise of stakeholders. The impact evaluation will require engagement with Welsh Government and external stakeholders to articulate the impact of specific actions of the LGBTQ+ Action Plan. While stakeholders were engaged during the assessment, the same levels of engagement cannot always be guaranteed in the future across all areas of the LGBTQ+ Action Plan. To mitigate this potential variation, the principles of a realist evaluation should be applied relatively flexibly in order to reduce the requirements on stakeholders. Interview questions for specific stakeholder of specific areas should be tailored to their area to maximise the effectiveness of conversations and combine discussions topics in as few separate interviews as possible.
- Ensuring representation of intersectionality: this is seen as a priority for
 the evaluation. Evaluators should consider different ways in which LGBTQ+
 people should be recruited and engaged with the evaluation in order to
 ensure genuine representation of intersectional experiences. They should
 also consider how the findings relating to intersectionality are considered
 within the overall findings of the evaluation to ensure the findings are
 summarised succinctly but also highlight intersectionality throughout.
- Continuity of Welsh Government support: stakeholders noted that the potential long-term nature of the LGBTQ+ Action Plan may mean that the evaluation may outlast existing Welsh Government officials and structures currently working on the LGBTQ+ Action Plan. The Welsh Government should ensure there is a sufficiently robust staff continuity plan in place to ensure proper handover of expertise, processes and stakeholder relationships. Recognising the importance of engaging with people who may generally be less likely to engage in policymaking, it is important that any staff and structural changes are made to maintain existing relationships and ensure continued engagement with marginalised groups.

Ethics and safeguarding: Interviews with LGBTQ+ people may involve
discussions on potentially sensitive issues. Fieldwork tools should be
designed to avoid unnecessarily covering such issues, and appropriate
ethics and safeguarding procedures put in place to minimise any adverse, for
both interviewers and participants. A support package is offered to the Expert
Working Group regarding the Banning of Conversion Practices; a similar
package should be offered to people who participate in the research for this
evaluation.

Economic evaluation

4.14 This work is not suitable for an economic evaluation because of an absence of data to quantify and monetise key outcomes for a value for money appraisal. Further data collection would be unlikely to improve the feasibility of an economic evaluation since few outcomes expected by the LGBTQ+ Action Plan are readily monetisable for an economic evaluation, given the focus on improving lived experiences and perceptions. Even if quantitative data became available, an economic evaluation would not be advisable because it may oversimplify the complexities of the LGBTQ+ Action plan and the full and varied intersectional experiences of LGBTQ+ people.

Number of interviews

4.15 The table below outlines three suggested options in terms of the number of interviews to conduct, for different levels of resourcing intensity.

Table 2: Suggested number of interview sizes

Evaluation	Resourcing option	Number of interviews, n
Process evaluation	High	40
	Medium	30
	Low	20
Impact evaluation	High	100 (n=60 interviews with LGBTQ+ people)
	Medium	75 (n=50 interviews with LGBTQ+ people)
	Low	50 (n=30 interviews with LGBTQ+ people)

4.16 The process evaluation is relatively light in terms of fieldwork compared to the impact evaluation and will focus on a relatively narrow set of questions, most of which will only require involvement from Welsh Government officials. It will not

seek to understand the experiences of LGBTQ+ people in relation to the LGBTQ+ Action Plan. The Low option of conducting 20 interviews would mainly target Welsh Government officials to evaluate internal processes and structures with respect to the LGBTQ+ Action Plan's implementation. This option is feasible by merging some process evaluation and impact evaluation interviews into one interview covering both topics. This will be possible with clear sign-posting from experienced interviewers. However, this approach would mean that the process and impact evaluation fieldwork will be less likely to explore topics in depth and identify any relevant nuances in experiences of stakeholders. It will also mean that some findings relevant to the process evaluation may only arise until the impact evaluation stage, which result in delays to implementing any improvements to process that could improve impact. Combining the interviews for the process and impact evaluations is therefore a possibility, but it would likely lead to less thorough fieldwork than options which include a greater number of interviews and a stronger separation between the process and impact evaluation.

- 4.17 The impact evaluation requires a larger sample size given it aims to understand the experiences of multiple groups within the LGBTQ+ community and intersectional experiences. To increase the reach and sample size of the evaluation with minimal resourcing impact, a large-scale survey of LGBTQ+ people in Wales should be carried out across all options in addition to interviews as described in Table 2.
- 4.18 The sampling estimates are based on (Andrew J.B. Fugard, 2014). For example the Low sampling option of 50 interviews will be able to detect one instance of a view expressed that has a 5% prevalence within the population. In other words, the sample is large enough to relatively confidently detect a view perceived by 1 in 20 individuals¹. However, it should be noted that the above sample sizes are purely indicative and reflect one round of evaluation.
- 4.19 Should the LGBTQ+ Action Plan become long-term and be refined periodically, then it would be advised that the process and impact evaluations are conducted periodically as well. This could also enable surveys and fieldwork to be developed

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¹ The parameter of a 5% prevalence is an assumption to illustrate the ability to identify a theme that has relatively low prevalence, as a benchmark. The choice of statistical power is based on Suresh K, Chandrashekara S. Sample size estimation and power analysis for clinical research studies. J Hum Reprod Sci. 2012 Jan;5(1):7-13. doi: 10.4103/0974-1208.97779.

such that they enable analysis of changes in perceptions and lived experiences over time.

Proposed timings of the evaluations

- 4.20 Considering that the LGBTQ+ Action Plan has been published and is already being implemented, the process evaluation could be conducted at anytime from Autum 2024 onwards. The impact evaluation should be conducted shortly after implementation of the Action Plan to ensure that any useful findings relating to the Action Plan are not forgotten by stakeholders and the underlying actions are still seen as relevant.
- 4.21 The impact evaluation should be conducted after the process evaluation, to enable any findings and recommendations from the process evaluation to be implemented and further improve the impact of the LGBTQ+ Action Plan. Undertaking the process evaluation after the impact evaluation would limit the ability to improve the Action Plan such that it can realise its full potential before its impact is then assessed.
- 4.22 It is recommended that the impact evaluation is conducted when the changes resulting from the LGBTQ+ Action Plan are likely to be generated and affect key metrics. Given that the impact evaluation will largely be driven by peoples' perceptions and experiences, which tend to change slowly over time, it is recommended that the impact evaluation is conducted several years after the LGBTQ+ Action Plan has been implemented and actions have been completed. However, postponing the impact evaluation for too long may result in a reduced ability to tie observed impacts to the Action Plan itself, as stakeholders may forget the Action Plan and those involved in the implementation may move on from their roles. It is therefore recommended that the impact evaluation should be conducted within 5 years of implementation.
- 4.23 However, if a new LGBTQ+ Action Plan is planned by a given date, or refreshed, then the impact evaluation should ideally be timed to be completed before the design of a new or refreshed LGBTQ+ Action Plan. This is to allow the learnings of the current Action Plan to inform the new version.
- 4.24 While the evaluation might be several years away, changes or improvements to data collection activities should begin immediately to provide an opportunity to collect several years of data. This could also include conducting a large-scale

survey before the impact evaluation in order to develop a near-baseline, before rerunning it at the impact evaluation stage to observe any changes.

Recommendations to improve the data landscape and support a future evaluation

- 4.25 Interviewees repeatedly emphasised that qualitative insights should be prioritised over quantitative data when evaluating the LGBTQ+ Action Plan for Wales this is discussed in more detail in paragraph 3.12. Nonetheless, quantitative data will have a role to play in an evaluation. We have therefore collected the recommendations from the Databank (Table 1) for the Welsh Government to improve the quantitative data available to evaluators of the LGBTQ+ Action Plan for Wales:
 - 1) The Welsh Government should oversample LGBTQ+ individuals within the National Survey for Wales to increase the quality and useability of data by sexual orientation. The Welsh Government should make data from the National Survey for Wales available to evaluators for more questions by sexual orientation. Evaluators should use this data cautiously, due to concerns over small sample sizes.
 - 2) The Welsh Government should add relevant questions to the National Survey for Wales, including a question to measure respondent's awareness of anti-LGBTQ+ hate crimes and the options available to report hate crimes.
 - 3) Welsh public services including the NHS should consider more frequently collecting data on service user's gender identities and sexual orientations in order to assess demand and identify any inequalities in service delivery. Data collection should be standardised and collected consistently.
 - 4) The Welsh Government should contact support services and/or public services to explore the availability of data on conversion practices. If this data is unavailable, Welsh Government officials should see if data on conversion practices is available from Galop and Victim Support in Wales.
 - 5) Welsh Government officials should collate a list of the equality forums described in Theme A of the LGBTQ+ Action Plan for Wales. This could be used to evaluate the implementation of the following action: Strengthen LGBTQ+ representation on equality forums.

- 6) Welsh Government should seek data from the General Register Office on the number of people who apply for a Gender Recognition Certificate within Wales.
- 7) The Welsh Government should have a greater focus on equalities issues in Overseas Network reports to inform the process evaluation. Welsh Government should include a chapter dedicated to equalities issues.
- 8) The Welsh Government should request and, if necessary, collate monitoring data on hate crimes by protected characteristics provided by the Home Office on Welsh police forces to inform the evaluation.
- 9) The Welsh Government should request monitoring data from the Wales Hate Support Centre. The data request should include: monitoring data regarding the number of LGBTQ+ referrals, data regarding their engagement with LGBTQ+ people, and data measuring the impact of their services for LGBTQ+ individuals.
- 10)The Welsh Government should request data from Welsh police forces regarding LGBTQ+ representation among PCSOs and police officers.
- 11)The Welsh Government should ask for regional breakdowns by sexual orientation and gender identity compared to sex recorded at birth from the Crime Survey for England and Wales. Validating the quality of this data will also be crucial, as low sample sizes are expected.
- 12)Welsh Government should provide updates on the outcome of the review into VAWDASV (violence against women, domestic abuse and sexual violence) indicators and seek to ensure that indicators will be available according to sexual orientation and gender identity.
- 13)The Welsh Government should include a question of sexual orientation and gender identity in the Wales Sanctuary Service's satisfaction survey. The data will need to be obtained and validated. This may be complex considering asylum is not a devolved policy area.
- 14) The Welsh Government should seek to secure health complaints data on the number of complaints from people who identify as LGBTQ+. If this is not possible, they should seek the number of complaints which reference anti-LGBTQ+ discrimination in healthcare.
- 15)It is unclear if the NHS Wales Staff Survey asks respondents to share their sexual orientation and gender identity. Welsh Government officials should investigate this, with the goal being that the survey results can be analysed

- according to sexual orientation, gender identity, and whether an individual's gender aligns with the gender described at birth.
- 16)Welsh Government officials should request monitoring data from the Welsh Gender Service especially regarding patient-reported outcome measures (PROMs), patient-reported experience measures (PREMs), and anonymised feedback from meetings between the WGS and trans representatives and make this data available to the evaluators.
- 17)Welsh Government officials should liaise with the School Health Research
 Network to ensure that future Student Health and Wellbeing Surveys ask
 secondary school pupils questions about both sexual orientation and gender
 identity and make this data available to the evaluators of the LGBTQ+ Action
 Plan for Wales. Currently, the survey asks for the respondent's gender and sex
 at birth and does not collect data on whether people identify as LGBTQ+ or any
 group within the community.
- 18) The Welsh Government should make website analytics data available to evaluators for the "Parenting: Give it time" website pages. To improve this data's usefulness for the evaluation, the Welsh Government should consider asking those visiting the webpage for feedback on their experience using these.
- 19) The Welsh Government should strengthen the Local Government Candidates Survey by asking if people's gender identity is the same as the gender that was described at birth. In addition, Welsh Government should seek to increase the response rate to this survey.
- 20)The Welsh Government should collect data on how many National Governing Bodies of sport in Wales have trans-inclusive policies by reviewing the policies of a sample of sporting bodies. This exercise should be repeated before the evaluation begins. This will allow for a baseline to be collected against which evaluators can determine changes in trans-inclusivity in Welsh sport and the implementation of the following action: Improve the access and participation of transgender people in sport.
- 21)The Welsh Government should seek monitoring data from Welsh Government-funded cultural organisations (Amgueddfa Cymru, the Arts Council of Wales, the National Library of Wales, the Royal Commission on the Ancient and Historic Monuments of Wales, and Sport Wales) to determine their role in promoting LGBTQ+ inclusion and any measurable impacts.

Glossary

Economic evaluation

Assesses whether a policy achieves value for money, in terms of whether the benefits to society produced by the policy are greater than its costs.

Fieldwork

Practical work conducted by researchers in the real world. This could include conducting interviews, focus groups and ethnographic research. Fieldwork involves collecting new data to be used in research.

Impact evaluation

Assesses whether an intervention or programme has been successful in achieving its intended aims.

Intersectionality

This is related to the way in which different types of discrimination (i.e., unfair treatment because of a person's protected characteristics) are connected to and affect each other. Intersectional discrimination is where a person is discriminated against because of a particular combination of two or more protected characteristics.

LGBTQ+

Refers to lesbian, gay, bisexual/bi, transgender/trans, queer or questioning people. Other letters can be added to the acronym to include other groups, orientations and identities, such as I (intersex) and A (asexual/aromantic). The + (plus) in the acronym is used as a shorthand to include and acknowledge other diverse terms people identify with and use to describe their identities and orientations, including intersex, asexual and aromantic people.

Mixed methods

Analytical approaches that combine quantitative and qualitative methods.

Process evaluation

Assesses how and why a policy has been implemented the way it has.

Qualitative data

Qualitative data focuses on experience and what can be observed. It is non-numerical in nature and often in-depth.

Quantitative data

Numerical data can be formed from any information that can be quantified, includes statistics.

5. Annex A: Literature review

- 5.1 As part of the evaluability assessment of the LGBTQ+ Action Plan for Wales, a review was undertaken of comparable strategies and interventions, academic evidence, and grey literature. Findings from this literature will feed directly into the Theory of Change and ensure that the evaluation frameworks developed are grounded in best practice and informed by previous attempts to evaluate LGBTQ+ strategies and interventions. The literature review will be divided into three categories: the first assesses the literature on complex evaluations and its applicability to the LGBTQ+ Action Plan for Wales; the second reviews evaluations of multi-strand plans and system-wide strategies to improve the lives of LGBTQ+ people; and the third considers evaluations of specific interventions within the LGBTQ+ Action Plan for Wales.
- In summary, the literature on complex evaluations provided insights that will inform the resulting Theory of Change and Evaluability Assessment. The search for evaluations of similar strategies uncovered useful examples from Norway and Sweden, in which evaluators used interviews, surveys, and conventional monitoring of actions to evaluate their LGBTQ+ action plans and emphasised the importance of a Theory of Change for such an evaluation. Finally, the search for evaluations of interventions similar to those in the LGBTQ+ Action Plan for Wales provided valuable insights regarding how best to evaluate the actions within the LGBTQ+ Action Plan. These learnings will inform the Databank and proposed options for evaluation.
- Please note that while the LGBTQ+ Action Plan and this evaluability assessment use the term LGBTQ+, some of the literature uses other terms such as LGBT, LGBTQ, LGBTI, and LGBT+. When referring to literature and statistics, this report uses the acronyms used in the source. In other sections of this report, LGBTQ+ is used exclusively.

Theory of complex evaluations

The LGBTQ+ Action Plan for Wales includes forty-six actions, across nine themes. Many of these actions are interrelated, leading to long causal links, and deal with the ever-changing landscape of LGBTQ+ people's rights, quality of life, and outcomes. It can therefore be categorised as a complex system in need of a complexity-sensitive evaluation.

- 5.5 Complicated systems refer to conceptualisations of social systems as having multiple actors, causal strands, and outcomes while also being an inherently dynamic system (Rogers, 2008). Complex systems are in constant change, with some changes appearing surprising, non-linear, or disproportionate (Glouberman and Zimmerman, 2002). In some cases, complex systems can be "nested" within each other, meaning complex systems can exist within larger complex systems (Byrne and Callaghan, 2014). The LGBTQ+ Action Plan may be considered a "nested" system within the wider system of the Welsh Government's intersectional social justice plans especially the Strategic Equality Plan (Welsh Government, 2020).
- 5.6 Complex evaluations consider interventions within complex social systems. The remainder of this section discusses complexity in evaluations. These interventions are often multi-pronged and diverse, attempting to affect change in different parts of a dynamic social system.
- 5.7 The academic literature on complexity in evaluations emphasises the importance of using a Theory of Change when conceptualising and evaluating multi-stranded policy interventions within complex systems (Dyson and Todd, 2010). At its core, a Theory of Change clarifies the underlying causal pathway between a policy intervention and its desired societal outcome, while also highlighting assumptions along this pathway that can then be tested by an evaluation (Chapman et al., 2023).
- 5.8 Theories of Change involving complex interventions, such as the LGBTQ+ Action Plan for Wales, should recognise the role of external influences in creating change (Abercrombie *et al.*, 2018; Mowles, 2014). As Valters (2014) writes, an organisation's Theory of Change can be undermined if it implies "that change in a society revolves around them and their program, rather than around a range of interrelated contextual factors, of which their program is part". In the context of the LGBTQ+ Action Plan, the literature therefore suggests that factors which affect Welsh LGBTQ+ people but are not included in the LGBTQ+ Action Plan or otherwise directly influenced by the Welsh Government should be clearly represented in the Theory of Change and its accompanying text.
- 5.9 The potential for unpredicted and ongoing changes within a system is a crucial component of complex systems (Ling, 2012). This can be represented by emphasising the uncertainties inherent in complex evaluations, in accompanying text, within a Theory of Change diagram, or through a system map (Wilkinson et

- al., 2021). By their nature, unpredictable changes cannot always be accurately represented in a Theory of Change creating out-of-date Theories of Change which require updating. Theories of Change can encourage outdated policymaking if they are not updated when wider circumstances change dramatically (Abercrombie *et al.*, 2018). Ultimately, when evaluating complex systems, a Theory of Change may need updating between the intervention and evaluation, between an evaluability assessment and an evaluation, or even during an evaluation itself. As Mason (2007: 159) argues, "theories of change are rarely explicit from the outset of an evaluation and thus require revisiting".
- 5.10 More practically, the academic literature on complexity-informed evaluations suggests that mixed methodologies a combination of quantitative and qualitative techniques are the "logical response" to increasingly complex interventions and evaluation requirements (Sanderson, 2000; Sanderson, 2003; Bristow et al., 2009). This will be reflected in this evaluability assessment.
- 5.11 Moving beyond academic theory, the authoritative guide on complexity for evaluation practitioners is the HM Treasury's supplementary guide to the Magenta Book, *Handling Complexity in Policy Evaluation*. The guide identifies eleven properties of complex systems: adaptation, emergence and self-organisation, unexpected indirect effects, feedback, disproportionate levers and hubs, nonlinearity, domains of stability, tipping points, path dependency, openness, and that systems will change over time regardless of interventions. The evaluability assessment will consider all these properties of complex systems, but this literature review will highlight four particularly relevant properties and their implications for evaluating the LGBTQ+ Action Plan for Wales. These four properties are openness (or open systems), feedback, unexpected indirect effects, and tipping points.
 - Open systems are systems with links and connections to the wider environment, meaning that external changes can have powerful effects within the system. The system of the LGBTQ+ Action Plan for Wales is heavily influenced by external factors, such as the representation of LGBTQ+ issues in wider culture and the policies of the UK Government in reserved matters. An evaluation of the LGBTQ+ Action Plan for Wales should recognise this. This evaluability assessment will recognise openness through its Theory of Change, noting where external influences will have a particularly strong

- impact. The supplementary guide recommends system mapping as an approach to recognise external influences when conducting an evaluation.
- **Feedback loops** are other noteworthy properties of complex systems. These occur when the outcomes of one part of a multi-strand intervention affect the implementation of interventions. They can improve the effectiveness with which an intervention is implemented, but they can also act as barriers to the effective implementation of interventions. For example, in the context of LGBTQ+ rights, an intervention to increase awareness of LGBTQ+ concerns in healthcare may precede a training course. If the awareness-raising was successful, the training course might be more effective as participants already recognise its value. However, if the awareness-raising caused a backlash, the subsequent training course could be less effective due to a lack of goodwill. The HM Treasury guidance recommends that sufficient time is allowed for interventions to be implemented and for feedback loops to develop before beginning an impact evaluation. One way of highlighting an expected feedback loop to evaluators and implementors of policy is to express anticipated feedback loops diagrammatically within a Theory of Change (Davies, 2018; Desta Research, 2022).
- Unexpected and indirect effects are caused by long causal chains within systems, which means that an intervention in one part of a system can have effects elsewhere. By their nature, these are difficult to predict. For example, the LGBTQ+ Action Plan for Wales includes actions aimed at increasing LGBTQ+ participation and acceptance in sports, which could increase the self-confidence of LGBTQ+ participants, increasing the likelihood of LGBTQ+ asserting their human rights. This sees an intervention in Theme G (Participation in Welsh life: culture and sport) affecting the outcomes within Theme A (Human Rights and Recognition) of the LGBTQ+ Action Plan. The guide recommends system mapping to identify indirect effects in complex systems.
- Tipping points refer to systems which undergo rapid change after a longer period of gradual change. These are related to feedback loops and unexplained indirect effects, for these surprising processes can rapidly increase the pace of change. For example, in relation to the LGBTQ+ Action Plan for Wales, this could be seen in the acceptance of LGBTQ+ pupils in schools where a tipping point is reached in which being labelled as

homophobic, biphobic, or transphobic gains such negative social connotations that pupils do not express and reinforce these behaviours. The guide suggests that computational and predictive models can be used to predict and recognise the effects of tipping points. When this is not possible – perhaps due to a lack of data and budgetary constraints – the supplementary guide states that a flexible and adaptive approach to evaluation can recognise tipping points.

5.12 While focusing on healthcare contexts, the UK Medical Research Council's (2015) guidance for process evaluations of complex interventions can inform complex process evaluations more broadly. Before undergoing a process evaluation, the MRC recommends that interventions should be clearly defined and causal assumptions clarified, such as through a Theory of Change. The Medical Research Council's guidance also suggests that evaluators should identify previous process evaluations of similar interventions and consider whether it is appropriate to replicate aspects of them and build upon their findings. The following section of this report considers how other multi-strand LGBTQ+ strategies were evaluated and whether any lessons can be learned from them.

Evaluations of multi-strand LGBTQ+ strategies

- 5.13 A literature review of evaluations of similar multi-strand LGBTQ+ action plans in other countries was conducted. The rationale for this search was to discover insights on best practices in this policy area and the suitability of different methodological approaches to evaluating LGBTQ+ action plans.
- 5.14 This began with a search for evaluations of LGBTQ+ action plans in English-speaking countries, which found no formal evaluations. Then a systematic search for evaluations of LGBTQ+ action plans was undertaken in a range of European languages, before translating action plans and their evaluations into English and sense-checking the translations with native speakers. Publicly-available formal evaluations only found in Norway. There are two main risks to using this approach. The first is that reports may be mistranslated. This was mitigated by the fact that the translations of evaluations were sense-checked by fluent speakers. The second risk is that translated search terms did not uncover all available LGBTQ+ evaluations in all languages, this is because other countries may use terms that are unfamiliar or translate poorly into English. This was mitigated as much as

- possible by a search strategy that included a variety of keywords, but full mitigation cannot be guaranteed.
- 5.15 The most relevant examples of LGBTQ+ action plan evaluations are seen in Norway. The Norwegian Government (2008) states that its 2009-12 action plan, Improving quality of life among lesbians, gays, bisexuals and trans persons, was the first LGBT action plan in the world (Norwegian Directorate for Children, Youth and Family Affairs, 2013). The 2009-12 plan's stated primary objectives were to end discrimination against the LGBT community and generally improve LGBT quality of life. However, it did not provide specific, measurable, or time-bound criteria to measure success. The core mechanism to tackle LGBT discrimination proposed in the action plan was to mainstream LGBT perspectives throughout the Norwegian government. The plan also proposed more specific policy changes and an LGBT research centre (LHBT-senteret), which was established within the Norwegian Directorate for Children, Youth and Family Affairs. It was this directorate which conducted the in-house evaluation of the action plan (Norwegian Directorate for Children, Youth and Family Affairs, 2013).
- 5.16 The 2009-12 action plan evaluation is primarily a process evaluation, but it also states an aim to assess the effectiveness of measures within the plan where possible. The evaluation argues that the plan's primary objective of ending LGBT discrimination in Norway was "not realistic" within the four-year timeframe and "appears more like a vision to strive for than a goal that is possible to reach." Due to this, the evaluation primarily evaluates the implementation of the ambition to mainstream LGBT perspectives within the Norwegian Government. The Directorate did directly monitor the progress of specific actions within the plan through status updates and desk-based research, generally finding that specific interventions were implemented well but that vaguer pledges and actions were not as frequently well-implemented.
- 5.17 The cornerstone of this evaluation was a survey of employees in Norwegian Government ministries. The survey received only eighteen responses, all from ministries that were already actively engaged with LGBT issues. Highlighting the limited success of mainstreaming LGBT perspectives and issues throughout government, not even all these ministries had mainstreamed LGBT perspectives in their work. Four of the eighteen ministries stated that the plan was not relevant to their ministries and nine viewed the plan as not relevant for municipal and county-level agencies. This contradicts the vision of LGBT perspectives being considered

- throughout government and at all levels. The evaluation was also informed by one round-table discussion comprised of representatives of LGBTQ+ organisations.
- 5.18 While the evaluation's scope and fieldwork were relatively limited, the evaluation's main findings were that there had been improvements, most notably in police response to anti-LGBT hate crimes, but that the primary objective of LGBT mainstreaming had not fully succeeded. It also argued that a lack of statistical data collection and reporting to a monitoring organisation had undermined both the implementation and the evaluation of the action plan. It called for a new action plan to continue the work of LGBT equality.
- 5.19 The Norwegian Government's second LGBT action plan was effective from 2017 to 2020 (Norwegian Government, 2016). The second action plan had more targeted goals than its predecessor, notably not including the broad and ill-defined commitment which was criticised in the 2013 evaluation of ending anti-LGBT prejudice completely within the lifespan of the action plan.
- 5.20 The second Norwegian LGBT action plan was evaluated by *Proba* Samfunnanalyse through two reports. The first report, a process evaluation published in 2020, was based upon interviews with eight representatives of ministries, eight representatives of directorates, four representatives of civil society, and an interview with Norway's Equality and Discrimination Ombudsman (Proba Samfunnanalyse, 2021). There was no evidence of systematic analysis of these interviews. Proba Samfunnanalyse's (2021a) second report, published in 2021, primarily used previously completed research and interviews. It did not include a Theory of Change, or clarify causal assumptions, instead suggesting that one should be included as part of the next Norwegian LGBTQ+ action plan. The evaluation revealed that a lack of measurable, time-specific targets undermined Norway's 2016-2020 action plan. Furthermore, many interviewees argued that multi-departmental commitments were the biggest failure of the action plan, for the lack of specific action owners led to a "pulverisation" of responsibility. A new Norwegian LGBTQ+ action plan is currently in force, with specific ministries named as responsible for each intervention but no evidence of a Theory of Change.
- 5.21 Beyond Norway, evaluations of LGBTQ+ action plans are more limited. For example, the UK Government (2019), the Irish Government (2019), the Maltese Government (2023), the Parliament of Iceland (2022), and Greek Government (2022) only make public monitoring updates or progress reports on the implementation of their action plans, with no evidence of formal evaluations or

- Theories of Change for their LGBTQ+ action plans. In some cases, especially the Icelandic Action Programme 2022-2025, the ILGA-Europe Rainbow map is relied upon to monitor the success and impact of LGBTQ+ action plans.
- 5.22 The Swedish Government's international development corporation agency Sida has evaluated the implementation of its own 2007-09 LGBT action plan (Sida, 2006; 2010). This plan primarily emphasises using aid and diplomacy to promote LGBTQ+ rights abroad. Like the Norwegian evaluations, Sida's evaluation also used interviews of key staff within Sida, including four out of six managers. It also engaged in group discussions and interviews with an external working group of representatives of LGBTQ+ organisations. Finally, Sida sent a questionnaire to staff in foreign countries, with 87% of Sida partner countries responding. Overall, this evaluation used similar methods to the Norwegian examples, but it is less directly applicable due to the narrower scope of Sida compared to a national government.
- 5.23 The main finding from this section is that evidence of holistic and comprehensive evaluations of relevant strategies is scarce. While LGBTQ+ action plans are relatively common across Europe, the vast majority do not have publicly-available formal evaluations. Having said this, there are lessons to be learned from the Norwegian and Swedish evaluations discussed above.
- 5.24 To conclude this review of evaluations of multi-strand LGBTQ+ action plans, the vast majority of international LGBTQ+ action plans do not undergo formal, publicly available evaluations. When plans are not formally evaluated, they tend to be appraised by reference to the implementation of actions and the ILGA-Europe Rainbow map, which ranks the legal and policy status of LGBTQ+ people in European countries. However, while talks are ongoing, Wales is not currently included in the ILGA-Europe Rainbow Map. In addition, the evaluations discussed above focus overwhelmingly on the views of policy officials and delivery partners. This resulted in the important finding in the Norwegian Directorate for Children, Youth and Family Affairs' evaluation of Norway's 2009-2013 LGBT Action Plan (2013) that a strong minority of Norwegian Government ministries believed that the plan was not relevant to their ministries. This is despite the plan's attempt to "mainstream" LGBT issues across Norway and across all of government. This finding was made through a survey of ministries, suggesting that surveys of senior officials in Welsh Government departments could be used to deduce the extent to which the LGBTQ+ Action Plan is prioritised and viewed as relevant within the

Welsh Government. In line with Magenta Book guidance (HM Treasury and Evaluation Task Force, 2020, p. 17), and the Welsh Government's commitment to engaging communities, we also believe that the evaluation of the LGBTQ+ Action Plan for Wales should engage widely with the LGBTQ+ community to genuinely reflect the experiences and determine the impacts of the plan.

Evaluations of interventions within the LGBTQ+ Action Plan for Wales

5.25 Recognising the relatively limited number of evaluations of multi-strand LGBTQ+ action plans, it is worthwhile to consider how the specific interventions in the LGBTQ+ Action Plan for Wales have been evaluated elsewhere. This sub-section therefore considers existing evaluations of interventions similar to those described in the LGBTQ+ Action Plan. It does not seek to provide an overview of "what works" with respect to LGBTQ+ policies. When evaluations are identified, this review primarily reports on their methodological approaches. Where evaluations are not available, guidance on best practice will be considered. The sub-section is structured according to the thematic structure of the LGBTQ+ Action Plan for Wales.

Human Rights and Recognition

- 5.26 The Action Plan proposes sharing resources and toolkits to increase understanding of LGBTQ+ human rights among the Welsh public and Welsh LGBTQ+ population. While no evaluations of this specific intervention regarding LGBTQ+ rights were available, the Office of the United Nations High Commissioner for Human Rights (2020) has published guidance on developing indicators to evaluate the impact of human rights education. It calls on evaluations to consider immediate, intermediate, and ultimate outcomes resulting from training programmes. It also argues that outcome statements should be as SMART (Specific, Measurable, Achievable, Relevant, Time-bound) as possible.
- 5.27 There are no available evaluations of campaigns to highlight the harms of conversion therapy or of measures to ban it. An evidence assessment commissioned by the UK Government Equalities Office found that there is an evidence gap concerning the impact of legislative and non-legislative measures to prevent conversion practices (Jowett *et al.*, 2021). It does, however, identify the Canadian city of Edmonton and the Spanish regions of Andalusia, Aragon, Madrid

and Valencia as having the most all-encompassing and comprehensive bans at the time of publication, measured by the punishments for breaking these laws. This suggests that conversion therapy bans can be compared by comparing their punishments and sanctions. This approach could be used in an evaluation of the LGBTQ+ Action Plan.

- 5.28 The Action Plan calls for Wales to work with other nations or intergovernmental organisations to improve the lives of LGBTQ+ people across the world. There are two major evaluations of specific campaigns to improve LGBTQ+ rights internationally. The first to be discussed is the United Nations 'Free and Equal' campaign, which aims to improve LGBTQ+ rights and acceptance in countries where new opportunities are emerging for advancing the rights of LGBTQ+ people. The evaluation of this campaign involved 89 interviews, primarily in the five case study countries of Brazil, Cabo Verde, Mongolia, and Serbia (Barcia and Kagumire, 2021). It also used a survey of staff within the ONHCR and another in all countries in which the campaign intervened. The variety of campaigning techniques and specific goals in the countries targeted, with no shared set of targets, made evaluation challenging. Nonetheless, the evaluation emphasised the "convening power" of the UN to promote collaboration between LGBTQ+ organisations and the UN's ability to legitimise LGBTQ+ organisations while providing moral support to beleaguered activists in challenging environments.
- 5.29 The second major evaluation of campaigns to promote LGBTQ+ rights abroad is seen in the Swedish International Development Cooperation Agency (Sida) evaluation of two projects to support LGBT voices and activism in the Global South and East (Sida, 2010). Success was defined as training 'Rainbow Leaders' to be able to lead and sustain organisations campaigning for local and international LGBT advocacy and that these organisations have the resources and capacities to engage in successful long-term human rights campaigns. An independent evaluation used a survey, which represented 30 of the 120 individuals who undertook 'Rainbow Leaders' training, alongside interviews with ten 'Rainbow Leaders' and 25 individuals in foreign and international development agencies. The evaluation also acknowledges the risk that those who did not respond were among the more dissatisfied. It also identified that many 'Rainbow Leaders' had undergone other training and interventions alongside the Sida-funded intervention, which could affect results. Overall, the survey results were overwhelmingly positive, and the programme was deemed a success - but the difficulties of

evaluating international programmes to promote LGBTQ+ rights are highlighted once more.

Safety and freedom from discrimination

- 5.30 The LGBTQ+ Action Plan calls for evidence to be gathered regarding the reporting of hate crimes. Chakraborti and Hardy (2015) studied the barriers faced by LGBT people reporting hate crimes in Leicestershire, finding that the normalisation of facing hate crimes and a lack of faith in police responses were the main barriers to reporting homophobic, biphobic, and transphobic hate crimes. The solutions proposed are varied but include training for police officers, better use of third-party reporting centres, and engagement of police with the LGBT community. The methodology for this study was qualitative in nature, centred around 50 interviews with LGBT people in Lancashire, recruited using organisations and more directly through cafes, bars, and community groups. This reduced the likelihood of only recruiting participants who were already held positions within LGBTQ+ organisations, arguably moving from interviewing representatives and figureheads of the LGBTQ+ community to a more balanced representation of LGBTQ+ people.
- 5.31 In considering measures to tackle hate crimes, the LGBTQ+ Action Plan calls for launching a revised version of the Hate Hurts Wales campaign. This public information campaign includes social media clips, newspaper articles, and so forth - all with the goal of raising awareness of what classifies as a hate crime, the importance of reporting hate crimes, and what the procedures are for reporting hate crimes. This public information campaign includes social media posts, newspaper articles, and video adverts. This campaign's evaluation or monitoring is not publicly available. However, a published Freedom of Information Request reveals that after the 2021/22 Hate Hurts Wales campaign, the percentage of people in Wales who would "likely" report a hate crime they witnessed increased by 2% - from 76% (2021) to 78% (2022) - in opinion polls (Welsh Government, 2023). Additionally, and while this does not necessarily mean that the rate of reporting increased for an increase in hate crimes could be the root cause, the total number of calls to Victim Support during the campaign period increased by +242% from 173 calls (2021) to 591 (2022). A very similar public information campaign by the Scottish Government was formally evaluated in 2019, with an opinion poll finding that 54% of Scottish respondents were aware of the campaign after prompting and increased the proportion of people who agreed that "it is

important to report hate crime to reduce it happening" from 80% to 83% (Scottish Government, 2019). Overall, there is evidence that public information campaigns can make a moderate difference in raising awareness of hate crimes and increasing the likelihood of reporting them. They can be evaluated by monitoring the use of hate crime reporting services or through public opinion surveys, although due to the difficulties of sampling a sufficient number of the LGBTQ+ community, such surveys are usually unable to provide a breakdown by sexual orientation or gender identity.

- 5.32 Improving the relationship of LGBTQ+ communities with Policing in Wales is another action outlined in the LGBTQ+ Action Plan. There are no evaluations of associated activities described in the plan, but the literature on police training on LGBTQ+ issues is relevant. Using a self-assessment survey before and after a five-hour LGBTQ+ training session in the USA, police officers scored as slightly more aware and compassionate toward LGBTQ+ people (Israel et al., 2014). On a 1-7 scale combining questions such as "I would treat an LGBTQ arrestee respectfully" and "I would intervene if I heard law enforcement personnel make an anti-LGBTQ remark", the mean score increased from 5.09 to 5.26. This study used a self-assessment questionnaire, which may not accurately reflect the experiences of LGBTQ+ people who engage with police who attended the training session. In addition, the survey had high dropout rates between pre-intervention and postintervention assessments. This suggests that mitigating dropouts should be prioritised when using surveys and self-assessment tools as part of a before-after approach. Ultimately, this literature review finds a lack of evidence to show the effectiveness of interventions to improve the relationships between the police and the LGBTQ+ community.
- 5.33 The plan calls for action against violence against women, domestic abuse and sexual violence (VAWDASV) among LGBTQ+ communities. In 2014, the Welsh Government commissioned study of the barriers LGBT people face when accessing Domestic Abuse, Stalking, Harassment and Sexual Violence Services in Wales (NatCen Social Research, 2014). The methodology included a desk-based evidence review, eighteen interviews with professionals, and a survey with responses from 34 LGBT people living in Wales. It found that services are "predominantly orientated towards heterosexual, cis women and [are] therefore perceived to be generally unresponsive to the specific needs of LGBT people."

 The report called for future evaluations to consider the level of LGBT referrals to

- the All-Wales Domestic and Sexual Violence helpline as a measure of change in LGBT people's access to appropriate services. It also called for trans experiences and the use of helplines to be monitored.
- 5.34 The Action Plan commits to ensuring that homelessness services are inclusive of the specific needs of LGBTQ+ people. In particular, the LGBTQ+ Action Plan and the wider literature recognise that LGTBQ+ youth homelessness is a challenge in Wales (Llamau, 2019). A major innovation in this policy area has been the establishment of Tŷ Pride a 24-hour supported housing scheme for 16-25-year-olds who identify as LGBTQ+ and are experiencing, or at risk of, homelessness. In a report on the scheme, the biggest success of the scheme was that all of the ten young people who had accessed support at Tŷ Pride had successfully either gone on to move independently or have gone back to live with their families (End Youth Homelessness Cymru, 2022). This report and forthcoming monitoring and evaluations of Ty Pride and any similar schemes which may arise could inform the evaluation of the LGBTQ+ Action Plan.
- 5.35 The evidence of homelessness services being able to effectively intervene to improve the mental health and conditions of LGBTQ+ young people is relatively robust. Grafsky et al. (2011) used a randomised controlled trial to evaluate the impact of providing 12 therapy sessions to homeless youth in Albuquerque, USA from 2001 to 2005. 52 participants identified as gay, lesbian, or bisexual (GLB) and 205 as heterosexual. Pre-intervention GLB youth were more likely to suffer from depression and substance misuse than non-GLB youth, but the effect of therapy was far greater for GLB youth than non-GLB youth. However, the authors note that the sample size of LGBTQ+ youth is much smaller than their heterosexual counterparts, and they recognise that this limits the evaluation. Another evaluation of an intervention to assist young homeless LGBTQ+ people and allies in the USA is of relevance (Powell et al., 2016). This "iTEAM" intervention in Arizona aimed to improve mental health, housing access, educational attainment, employment, and HIV prevention and treatment. It involved an LGBTQA youth drop-in centre, which provided counselling and an informal community space, two community-based housing providers, and a separate AIDS testing and education service. 210 young LGBTQA people were interviewed both before and after the "iTEAM" services became available. It found statistically significant improvements in mental health and reductions in homelessness and housing stress, the latter reducing from 52.5% of participants

experiencing housing stress prior to the intervention to 31.8% post-intervention. However, the authors recognise that the lack of a control group is a limitation of this evaluation. They also note that the reliance on self-reported data limits the validity of the evaluation. Thus, these cases suggest that evaluations of LGBTQ+ youth homelessness can be strengthened by the consistent use of control groups, increased variety of data reporting methods, and increased sample sizes of young LGBTQ+ homeless people.

A nation of sanctuary for asylum seekers and refugees

5.36 No evaluations of the specific actions and activities in this theme of the LGBTQ+ Action Plan were available. Studies tend to focus on evaluating interventions targeted towards asylum seekers and refugees as a whole.

Health, Social Care, and Well-Being

- 5.37 The Action Plan includes many measures to improve the experiences of LGBTQ+ workers and service users within the health and social care sector. Evaluating the impact of these interventions can be challenging. While the 2018 NHS Wales Staff Survey included questions on LGBTQ+ identity and broad questions regarding job satisfaction, experiences, and bullying and harassment, the publicly-available report does not break-down results by sexual orientation or gender identity (NHS Wales, 2018). The NHS England (2022) Staff Survey for 2022 can be viewed by sexual orientation. They also ask whether staff experienced discrimination over the previous 12 months and whether they believe this was due to their sexual orientation.
- 5.38 A systematic evidence review of educational materials for health and social care professionals in LGBTQ+ issues suggests that interventions are effective at tackling negative attitudes and behaviours towards LGTBQ+ people if they involve direct interaction between heterosexual staff and an LGBTQ+ peer or lecturer that they already know, and many of the purely educational interventions without personal interaction are ineffective (Hunt *et al.*, 2019). This suggests that measuring the level of personalisation in LGBTQ+ training could be used in an evaluation of the LGBTQ+ Action Plan for Wales.
- 5.39 There is currently a lack of evidence regarding the evaluation of interventions to improve the experience of LGBTQ+ staff and service users in health and social

care. Currently, research emphasises understanding the experience of LGBTQ+ people in social care rather than the effectiveness of interventions to improve these experiences. However, a research team led by the University of Birmingham (n.d.) will begin publishing research outputs soon for the LGBTQ+ Older Adult Social Care Assessment. It will evaluate how social care workers in England engage with sexual orientation and gender identity by surveying and interviewing workers and older LGBTQ+ adults with experience of social care, examining training materials, and considering quantitative evidence.

Inclusive Education

- 5.40 The literature on LGBTQ+ inclusivity in education tends to focus on preventing homophobic, biphobic, and transphobic (HB&T) bullying. An evaluation of eight interventions to prevent HB&T bullying in English schools by Mitchell et al. (2016) included qualitative surveys both before and after interventions. Some of the follow-up surveys were conducted immediately after training, while others were done weeks or months after the intervention. Overall, 850 school staff and 2,407 pupils were surveyed at baseline and after the interventions. Surveys of pupils were always conducted in-person and on paper, while surveys of teachers varied but were predominantly online. All follow-up surveys of teachers were online. The evaluation identified several limitations, most notably that the differences between pre-intervention and post-intervention surveys meant that impact could not be measured. Uniformity of surveys before and after interventions, as well as attempting to ensure the same participants take both surveys, is implied to be a way forward. Ultimately, the evaluation's key finding was that training teachers in bespoke one-day sessions seemed to be highly effective at increasing confidence to challenge HB&T bullying but that changing pupil attitudes was more challenging.
- 5.41 While there is literature on best practices in supporting LGBTQ+ students at universities (Smithies and Byrom, 2018), no formal publicly-available evaluations of relevant interventions in the higher education sector were found.

Communities, Private and Family Life

5.42 The Action Plan calls for the government to support the family lives of LGBTQ+ people and suggests mainstreaming LGBTQ+ representation in resources made for families and children. There is theoretical literature suggesting that LGBTQ+

representation in children's books increases LGBTQ+ acceptance and self-acceptance among young people (Tschida et al., 2014). It often calls for LGBTQ+ characters to be diverse across intersectional categories and for their sexual orientation or gender identity to not be the sole, defining fact of LGBTQ+ characters (Leung and Adams-Whittaker, 2022). However, while no evidence is presented to the contrary, substantiation of these claims through formal evaluations or interventions could not be found.

5.43 Promoting LGBTQ+ representation in elected office is a priority of the LGBTQ+ Action Plan. A survey of candidates for the 2022 Welsh local elections, with a response rate of 15% for county candidates and 11% for community candidates, found that 6% of councillors elected identified as lesbian, gay, or bisexual (Randall et al., 2022). Only binary sex was recorded, with no data on gender identity available. This suggests there is room for improvement in collecting sexual orientation and gender identity at the level of local government. At the Senedd level, three Members of the Senedd are out as gay, lesbian, or bisexual – and none are out as transgender.

Participation in Welsh Life: Culture and Sport

5.44 Improving the representation, inclusion, and participation of LGBTQ+ people in sports is a goal of the LGBTQ+ Action Plan. The most comprehensive evaluation of LGBTQ+ inclusion and participation in sport may be seen in Australia. Storr et al. (2021) considered studies on LGBTQ+ acceptance and inclusion across the sports sector – including state-funded sports organisations, Australian cricket and tennis, young people in sports, and supporter groups. Combined, these studies included 336 survey respondents, 123 individual interviews, 5 focus groups (totalling 25 participants) and 50 participant observation hours. This qualitative data was inductively analysed using NVivo, identifying themes and sub-themes. The article emphasises that there is a difference between LGBTQ+ acceptance and full inclusion, meaning that quantitative data, such as surveying the proportion of LGBTQ+ members of sporting teams and associations, is often insufficient. Furthermore, the authors recognise that quantitative data is limited for it often requires considering LGBTQ+ people as a single category, as this can underrepresent the experience of lesbians, transgender, gender-diverse, and gender non-conforming people. The article therefore emphasises the importance of qualitative data when considering LGBTQ+ participation in sports, as qualitative data can reflect the diversity within the LGBTQ+ community and the level of inclusion and acceptance for LGBTQ+ sports participants. This finding will be reflected in the evaluability assessment.

5.45 There are no publicly available evaluations of interventions regarding LGBTQ+ representation and the Welsh-language.

Inclusive Workplaces

5.46 In an article examining the ethics of conducting research on LGBTQ+ individuals in the workplace, Hodson et al. (2018) highlight the ethical concerns of researching LGBTQ+ inclusion at work, arguing that achieving randomised and representative samples is challenging when some LGBTQ+ workers may not wish to be "out" at work. They do not offer "fixed ethical guidelines" (2018: 293), but their work does raise questions regarding ethical sampling and using quantitative methods to evaluate LGBTQ+ experiences at work without "outing" employees to colleagues and management. A solution may be seen in Stonewall Cymru's (2018) LGBT in Wales - Work Report, which used a YouGov survey of 1,272 LGBT people in Wales, recruited through YouGov's panel and open recruitment through a wide range of organisations, community groups, and individuals. Yet, open recruitment means that this is not a random sample of LGBTQ+ people in Wales. Ultimately, this literature suggests that surveys should be considered in tandem with qualitative methods, where evaluators have high levels of compassion and understanding of LGBTQ+ employees - whether they are open about their sexuality at work or not.

Impact of Covid-19

5.47 The Action Plan calls for a rapid evidence review regarding the impact of COVID-19 on LGBTQ+ people. Whether an REA has been conducted or not should be assessed through the usual monitoring frameworks.

6. Annex B: Findings from the stakeholder interviews

6.1 This evaluability assessment was informed by widespread stakeholder engagement, with 36 interviews held across 50 interviewees. Of these, 12 interviews were conducted with representatives of organisations external to the Welsh Government – such as Stonewall Cymru, TransVision Cymru, and the

Welsh Gender Service. To allow organisations to speak freely, these answers are attributed to "external interviewees" rather than the organisations themselves. The remaining 24 interviews, with 38 interviewees, were conducted with Welsh Government officials working across all relevant policy areas. To allow Welsh Government officials, professionals in arms-length bodies, and professionals in independent regulators to speak freely, their answers are attributed to "internal interviewees" rather than to named individuals, departments, or organisations. These interviews were conducted in order to deepen understanding of what success means in the context of the LGBTQ+ Action Plan for Wales, the risks and assumptions within the plan, and how the LGBTQ+ Action Plan could be evaluated.

Comments on the aims and ambitions of the plan

- 6.2 Interviewees valued the aim of the LGBTQ+ Action Plan for Wales to make Wales the most LGBTQ+ friendly nation in Europe. However, they often stated that this would be difficult to measure and that other indicators of success would therefore be necessary to evaluate the LGBTQ+ Action Plan. Interviewees suggested that an important indicator of the plan's success would be a wider recognition that Wales is an LGBTQ+ inclusive country, both within Wales and the international media. Interviewees suggested that the media and international community do not recognise that Wales has a separate trajectory on this issue compared to the UK Government and that this changing would indicate the plan's success.
- 6.3 External interviewees identified that some of the impacts of the LGBTQ+ Action Plan will take many years to manifest. A common view among external interviewees was that while the activities in the plan should be implemented by the end of this Senedd term, the outcomes especially those relying on behavioural change would take longer to be realised. Of these longer-term outcomes, internal and external interviewees emphasised that the following criteria would indicate that the LGBTQ+ Action Plan for Wales has been successful:
 - a greater awareness of the LGBTQ+ community and its rights among the
 public and policymakers, increased reporting of LGBTQ+ hate crimes and
 awareness of the ways to report hate crimes, a stronger relationship between
 the police and LGBTQ+ communities, the new LGBTQ+ inclusive curriculum

- being implemented and leading to more LGBTQ+ inclusive schools with a reduction in anti-LGBTQ+ bullying,
- inclusive health practices leading to greater confidence among LGBTQ+
 people when using general healthcare services, fertility services, maternity
 services, and gender services.
- Many external interviewees stated that the creation of a Gender Service for young people within Wales would be a crucial outcome of the LGBTQ+ Action Plan for Wales. In addition, the reform of the Gender Recognition Act and the banning of conversion therapy were highlighted as key to ensuring that LGBTQ+ people have their human rights respected in Wales. These findings are reflected in the Section 3 and its Theory of Change.

Comments on the monitoring and evaluation of the plan

- The interviews revealed surveys and evaluations which will inform the Databank. However, it also highlighted that there is an insufficient level of existing surveys and monitoring data to sufficiently evaluate the plan. This means that further fieldwork will be required to evaluate the LGBTQ+ Action Plan.
- 6.5 Many interviewees stressed that an evaluation should not rely on using quantitative data to measure success because it is unlikely to reflect the diversity of experiences within the LGBTQ+ community, particularly intersectional experiences. Instead, interviewees were enthusiastic about a more qualitative approach to evaluating the LGBTQ+ Action Plan with quantitative data playing a supporting role. They emphasised that qualitative fieldwork should emphasise the variety of lived experiences and perceptions of LGBTQ+ people in order to measure the impact of the LGBTQ+ Action Plan for Wales.
- Interviewees stated that qualitative fieldwork must engage with LGBTQ+ people directly and not only the representative bodies of the LGBTQ+ community. This means that the evaluation should place particular emphasis on engaging with people who would not usually complete Welsh Government surveys or consultations. Interviewees were highly enthusiastic about the evaluation working with established groups and events to conduct in-person fieldwork. It was suggested that the evaluation should visit LGBTQ+ centres and groups because talking to people in their own environment and where they feel safe would increase the number who engage with the process and the openness of their responses. In

addition, in-person fieldwork across Wales can help ensure that the regional and linguistic diversity in Wales is met by the evaluation, addressing concerns among some stakeholders that the evaluation could over-emphasise the experiences of people living in Cardiff.

6.7 The following sections discuss views relating to each of the LGBTQ+ Action Plan's themes and actions.

Theme A: Human Rights and Recognition (Actions 1 – 8)

Actions 1-2: Strengthen understanding of the human rights of LGBTQ+ people; Improve LGBTQ+ people's understanding of how to assert their human rights

- Strengthening the understanding of the human rights of LGBTQ+ people was seen as paramount to the success of the LGBTQ+ Action Plan for Wales, with internal and external stakeholders emphasising the centrality of human rights to other desired outcomes of the plan such as a reduction in anti-LGBTQ+ hate crimes and bullying in schools. This is true for improving the understanding of LGBTQ+ rights within the LGBTQ+ community and the wider general population. Interviewees highlighted that a range of measures are already underway to increase the awareness of the rights of LGBTQ+ people in Wales, including a project with Age Cymru to raise the awareness of the rights of older LGBTQ+ people, and these could inform an evaluation.
- While interviewees recognised that outcomes of these efforts could be evaluated through directly monitoring the impact of the respective awareness programmes or surveying the general population's awareness of LGBTQ+ rights, it was often suggested that assessing the success of these actions through more indicative outputs (such as greater service-user satisfaction among LGBTQ+ people) would be more effective than attempting to measure the impact of training sessions directly. Monitoring whether public services and the wider population are aware of when LGBTQ+ human rights are breached and how to act to resolve these breaches was seen as important by many stakeholders. An example of this in practice would be whether schools and hospitals are aware of conversion practices and the pathways available to safeguard survivors. Multiple interviewees suggested that evidence for human rights being respected among the wider population would include the public knowing why and how to report hate crimes,

with this measured by the number of bystanders reporting anti-LGBTQ+ hate crimes to the police. Interviewees also suggested that this action's outcomes could be monitored with reference to the reports of the Equality and Human Rights Commission, the Children's Commissioner for Wales, the Older People's Commissioner for Wales, and other Welsh Commissioners.

Action 3: ban all aspects of LGBTQ+ Conversion Practices

- 6.10 Interviewees recognised that the full implementation of Action 3 relies upon the UK Government either devolving the powers to ban conversion practices to the Welsh Parliament or comprehensively banning conversion practices itself. Interviewees stated a preference for the Welsh Parliament to receive the powers to ban conversion therapy, due to a perception that this ban would be more comprehensive and politically secure than a ban by the UK Parliament. However, it was also recognised that a UK-wide ban could be more effective and consistently enforced by a government with more policy levers, including responsibility for policing and the justice system.
- 6.11 Despite the role of the UK Government in banning conversion practices, stakeholders stated that Wales can make progress no matter the actions of the UK Government. The raising of awareness among public service providers of the support services available to survivors was recognised as important by interviewees, with an increase in referrals to these services recognised as an important part of the evaluation of the LGBTQ+ Action Plan.

Actions 4-5: Strengthen LGBTQ+ representation on equality forums; Involve LGBTQ+ Communities in designing public services

6.12 These actions were viewed to have long-term impacts that would not be easily attributable to the equality forums or the design of public forums. In particular, it was viewed that these actions have particularly long and complicated causal links between the activities and the outcomes described in the LGBTQ+ Action Plan. Some stakeholders raised concerns that LGBTQ+ inclusion in forums may be underestimated by evaluators, as some members of forums may not disclose that they are LGBTQ+. Nonetheless, stakeholders were confident that the inclusion of LGBTQ+ representative organisations in inclusion forums could be measured to inform the evaluation of this Action.

Action 6: Provide recognition of non-binary and intersex people

- 6.13 Stakeholders emphasised that the activity of reviewing the language of policies and guidance to be sensitive to gendered language and gender markers would help show that the Welsh Government recognises and values non-binary people in Wales. However, interviewees believed that the evaluation should not prioritise evaluating whether changes to guidance and policies have been made as this would be resource intensive. It was therefore proposed that evaluating the experience-based outcomes of this action specifically that non-binary and intersex people's needs are identified and met within public services through qualitative fieldwork would be the most insightful and resource-appropriate way to evaluate this activity.
- A different view was taken on the second activity in this action, which is to initiate conversations with the UK Government to recognise non-binary people on passports and driving licenses. Evaluating whether or not these conversations have occurred as a result of the LGBTQ+ Action Plan was deemed to be a useful way of monitoring the implementation of this activity. The effect of any policy change could be discussed in the qualitative fieldwork proposed above.

Action 7: Seek the devolution of powers in relation to Gender Recognition

- 6.15 Stakeholders consistently argued that the devolution and reform of gender recognition is important to determining the overall success of the plan. A majority of external stakeholders argued that Wales could not achieve the primary ambition of the LGBTQ+ Action Plan for Wales to become the most LGBTQ+ friendly nation in Europe if the Gender Recognition Act is not reformed to include self-identification. The primary reason provided for this is that gender recognition is fundamental to people's identity and impacts every day on how they obtain services and are treated by society.
- 6.16 However, the judicial review of the Gender Recognition Reform (Scotland) Bill was widely recognised as relevant to the implementation of this action. The interviews for this work were conducted between September and November 2023, such that they were not informed by the Court of Session upholding the UK Government's Section 35 order to block the passing of the Gender Recognition Reform (Scotland) Bill in December 2023. Stakeholders agreed that the implementation of this action could be monitored relatively simply by examining whether there have been progressive reforms to the Gender Recognition Act.

Action 8: International engagement showcases our LGBTQ+ values and support in Wales and globally

- 6.17 Welsh Government stakeholders argued that the LGBTQ+ Action Plan is a key part of the Welsh Government's diplomatic strategy and messaging, arguing that it symbolises what Wales believes as a country. The Welsh Government also funds the international activities of four strategic partners the Urdd, the Future Generations Commission, the Arts Council of Wales, and Academi Heddwch and monitors their activities to promote LGBTQ+ values abroad. While they do publish an annual report on international relations through the Overseas Network report which discusses work done to promote Welsh values, including LGBTQ+ equality, Welsh Government stakeholders recognised that the impacts of promoting LGBTQ+ issues abroad are difficult to quantify (Welsh Government, 2023).
- Other relevant actions promote an inclusive approach to procurement and proposes targets to increase the diversity of Welsh Government's supply chains. However, stakeholders emphasised the challenges of monitoring LGBTQ+ diversity in its supply chain. For example, the sexual orientation and gender identity of the business owners and workforces bidding for contracts are not monitored by the Welsh Government. However, Welsh Government stakeholders emphasised that qualitative fieldwork could help to improve insight in this area, such as through focus groups of LGBTQ+ owned SMEs and interviews with representative bodies such as the Federation for Small Businesses Wales, Chambers of Commerce across Wales, and the Chartered Institute of Procurement and Supply.

Theme B: Safety and Freedom from Discrimination (Actions 9 – 14)

Action 9: Remove barriers to LGBTQ+ people reporting hate crime

- 6.19 Internal interviewees emphasised that the Welsh Government do not have statutory powers to determine the direction of policing in Wales because policing is a non-devolved policy area. However, Welsh Government priorities can be shared with police forces in Wales and other partner organisations through a range of bodies notably the Hate and Community Tension Board, which meets quarterly.
- 6.20 Internal stakeholders reported that data on LGBTQ+ hate crime victims' satisfaction with police responses is not systematically collected and aggregated at a Wales-wide level. However, some police forces collect data on the satisfaction of all hate crime victims with the reporting process. An interviewee suggested that

evaluators of the LGBTQ+ Action Plan may be able to request data from the four Welsh police forces on the satisfaction of LGBTQ+ hate crime victims with the police response. Additionally, internal stakeholders emphasised that the time it takes for a hate crime case to go through the police and justice system can be monitored and that this may indicate victim experience and satisfaction. It was suggested that this data may be collected in the England and Wales-wide Criminal Justice System Delivery Data Dashboard (UK Government, n.d.) by the time an evaluation takes place – however, this dashboard does not yet allow for hate crime reports to be separated from other types of crime. Only if this changes will the Dashboard be able to inform the evaluation of the LGBTQ+ Action Plan.

- Internal and external stakeholders widely recognised the challenges of using hate crime reporting data in an evaluation because successful efforts to increase the rate at which hate crimes are reported could be interpreted as suggesting that more hate crimes are taking place in Wales. Many external stakeholders argued that, if the plan is successfully implemented, the total number of hate crimes reported to police would increase in the short-term as barriers to reporting hate crimes are removed and reporting rates increase. External stakeholders suggested that reports of hate crimes would only decrease in the medium to longer term as preventative measures take effect. Instead, it was suggested that the Wales Hate Support Centre plays an important role in helping victims report hate crimes and that their monitoring data could be useful in evaluating the reach and engagement of support services. Internal interviewees believed that the Support Centre records the sexual orientation and gender identity of those who use the service.
- 6.22 Furthermore, internal interviewees suggested that the level of LGBTQ+ representation among Police and Community Support Officers (PCSOs) and police officers, and their engagement with the LGBTQ+ community, could be monitored. As the Welsh Government funds PCSOs, it was suggested that it could facilitate access to diversity data on PCSOs for the evaluation of the LGBTQ+ Action Plan for Wales. However, they noted that this data may not be collected in a standardised way across Wales. In addition, interviewees emphasised that qualitative measures and case studies of reporting processes will be crucial to evaluating whether barriers to LGBTQ+ people reporting hate crimes have been removed.
- 6.23 External stakeholders also raised that minority ethnic and trans people within the LGBTQ+ community may have different perceptions and experiences of the police

and that an evaluation of the LGBTQ+ Action Plan should recognise the specific challenges faced by these groups when reporting hate crimes to the police. They recognised that different experiences of these groups would be difficult to measure quantitatively, and therefore lend themselves to qualitative methods.

Actions 10-11: Continue to invest in hate crime prevention programmes across Wales; Counter online anti-LGBTQ+ attitudes and hate crimes

- As part of Theme B, interviewees representing external stakeholder groups were more likely to emphasise the importance of Action 9 (relating to increased reporting of hate crimes) than Actions 10 and 11. Nonetheless, there was recognition that prevention plays an important role in tackling hate crime. Among external interviewees, the education system, and in particular the Welsh Government's curriculum reforms, were viewed as key to preventing prejudice and hate crimes against LGBTQ+ people over the long term. This will inform the Theory of Change.
- 6.25 Internal interviewees emphasised that Hate Hurts Wales plays an important role in the Welsh Government's strategy to prevent hate crimes in Wales. It is evaluated internally, mostly through the monitoring and engagement data provided by the external contractor who runs the programme.

Action 12: Improve the relationship of LGBTQ+ communities with Policing in Wales

External interviewees framed their comments on improving the relationship between LGBTQ+ people and the police in Wales through their comments on hate crimes. Interviewees were hopeful that a forum between LGBTQ+ communities and police in Wales would improve the relationship between these groups. Some interviewees emphasised that the forum would only be effective in accurately raising LGBTQ+ issues with the police if it is genuinely representative of the Welsh LGBTQ+ population, with intersectional representation and grassroots LGBTQ+ voices. An interviewee noted that, for the forum to succeed, it is highly important to ensure that groups that tend not to engage with police are able to be involved. An external interviewee also emphasised that the four police forces in Wales may have different relationships with LGBTQ+ communities and that any evaluation should recognise these differences between policing regions.

Action 13: Target violence against women, domestic abuse and sexual violence (VAWDASV) among LGBTQ+ communities

6.27 Only interviewees working within the Welsh Government commented on this topic. They noted that the Welsh Government's VAWDASV strategy emphasises preventative and early-stage interventions, while the LGBTQ+ Action Plan's references to VAWDASV emphasise later-stage interventions. Nonetheless, internal interviewees were optimistic that Action 13 is being implemented thoroughly, with a focus on considering intersectionality at all stages, and will lead to the outcomes being achieved. Interviewees emphasised that LGBTQ+ people have different barriers to reporting VAWDASV and that their approach is informed by the Survivor Voice Scrutiny and Involvement Panel. When asked if this panel could play a role in the evaluation, it was suggested that this would be outside of the remit of the panel. In addition, interviewees noted that the Welsh Governmentsupported Live Fear Free helpline does not systematically ask callers about their sexual orientation or gender identity. Ultimately, interviewees suggested that evaluating the experiences of LGBTQ+ people reporting VAWDASV would be challenging but that the national indicators on VAWDASV are being reviewed. Welsh Government interviewees suggested this could mean that more data will become available at the time of the evaluation.

Action 14: Homelessness services are inclusive of the specific needs of LGBTQ+ people

Welsh Government interviewees argued that, while the activities in the Plan can be implemented, they may take a long time to take effect. For example, activities on new policies and legislation on homelessness and innovation across homelessness projects were identified as having long causal chains to the outcomes. It was stated that many of the activities in this action would not have an impact on support services by the time of the evaluation. In addition, the activity of working with Local Authorities and care home providers to provide training caused confusion among internal interviewees, who were unclear as to who is responsible for the implementation of this activity. However, the activity regarding the evaluation of Ty Pride – as part of a larger evaluation of homelessness projects - is ongoing and due to be published in 2024. Internal interviewees emphasised that overburdening homeless LGBTQ+ people with fieldwork should be avoided because they are already asked to contribute to many research projects. In addition, they tend to engage with services at times of difficulty when collecting

data is not the priority. Ultimately, interviewees believed that a process evaluation should precede an impact evaluation because impacts in this policy area may not materialise for some years to come. Of the external interviewees who discussed homelessness policy, there was a focus on Tŷ Pride. Its continuation and replication in other parts of Wales was seen as a key metric of success.

Theme C: A nation of sanctuary for asylum seekers and refugees (Actions 15-17)

Action 15-17: Identify, safeguard and signpost LGBTQ+ people in claiming asylum; Encourage the development of LGBTQ+ only asylum properties in Wales; Ensure Wales a Nation of Sanctuary remains inclusive of LGBTQ+ people

- 6.29 Interviewees recognised that most powers in this area are reserved to the UK Government.
- 6.30 Regarding Action 15, the interviewees stated that negotiations have not begun with the UK Government to amend ASF1 Forms. They raised the difficulty that some asylum seekers would be unwilling to inform authorities of their sexual orientation or gender identity, as they fear it may negatively affect their claim or put them at risk. Interviewees suggested that part of this is that many sanctuary seekers are not aware of the differences between the Welsh and UK Government approaches to asylum, and that this means they may be reluctant to inform Welsh officials if they are LGBTQ+. This undermines the ability of Welsh services to identify and support LGBTQ+ asylum seekers, but it also undermines the quality of data available for monitoring and evaluation.
- 6.31 Regarding Action 16, interviewees stressed that the Welsh Government's influence with the Home Office and its accommodation providers is limited. While housing and homelessness are devolved matters, the accommodation of sanctuary seekers is not. This means that the Welsh Government and Local Authorities can directly support individuals who have been granted refugee status, but not those seeking asylum. This means that the links between Action 16's activities and outcomes assume that the Home Office will be engaged and cooperative. Having said this, the Welsh Government and its partners such as the Wales Sanctuary Service have a role to play in elevating concerns about housing to the Home Office and interviewees stated that the effectiveness of this process could be evaluated.

- 6.32 Regarding Action 17, interviewees emphasised the importance of the Wales Sanctuary Service and other organisations. These inform sanctuary seekers of their rights, and the services they can access without affecting their claim. Interviewees suggested that the Sanctuary Service monitor the satisfaction of asylum seekers with their services and wider experiences but that this is not currently broken down by sexual orientation or gender identity. When considering training for local authority staff and others who work with sanctuary seekers, interviewees emphasised that turnover and rotations of staff are high in this sector meaning that providing basic information is extremely important.
- Overall, internal interviewees emphasised that evaluating the impact of the LGBTQ+ Action Plan upon LGBTQ+ sanctuary seekers in Wales will be challenging, with linguistic barriers and concerns about claims potentially limiting engagement with evaluators. External interviewees suggested that the evaluation should engage with organisations that work with LGBTQ+ refugees and asylum seekers notably the *Hoops and Loops* support group for LGBTQ+ asylum seekers in Cardiff. In addition, external interviewees suggested that an evaluation should consider the Welsh response to international threats to LGBTQ+ rights, such as the anti-homosexuality bills in Uganda and elsewhere.

Theme D: Health, Social Care, and Well-Being (Actions 18-25)

Action 18: Understand and improve the experience of LGBTQ+ people in the health and social care sectors

6.34 In section 18.1, internal interviewees working in health and social care emphasised that training on LGBTQ+ inclusion should be planned and delivered as part of a wider package of equality and diversity training, with collaboration between the equalities Action Plans. Training which emphasises all forms of inclusion and equality was viewed as preferable by interviewees because of the intersectional needs of individuals experiencing care and due to the intense time pressures within these sectors. Internal interviewees also recognised the long causal chains between reviewing LGBTQ+ experiences of health and improving training and the outcomes of LGBTQ+ people feeling safer and better understood in health and care settings, with a relevant assumption being that training is effective and that LGBTQ+ patients, service users, and staff have better experiences because of this training. External interviewees emphasised similar points, with a greater emphasis on training at the primary care level. They noted that inclusive GPs can have a strong positive impact on LGBTQ+ experiences of care, as GPs have a key role in

onward referral for gender-affirming care and more. It was suggested that one way of informing LGBTQ+ people that GPs have undergone and learned from LGBTQ+ inclusivity training would be for surgeries to be accredited as "LGBTQ+ Aware" surgeries.

- In section 18.2, internal interviewees discussed how health and care inspections have been recently reformed as a result of the LGBTQ+ Action Plan to have a greater focus on LGBTQ+ inclusivity. However, they warned that inspections cannot be used to monitor LGBTQ+ inclusivity across health and social care for not all outputs of inspections will refer to LGBTQ+ inclusivity and that inspectors are under pressure from competing demands during their visits. Interviewees working in health stated that the Health Inspectorate Wales may include LGBTQ+ inclusivity in its annual report if there is strong data. They also suggested that Health Inspectorate Wales is considering conducting a review of health inequalities for trans people and this could form part of an evaluation.
- 6.36 In section 18.3, many external interviewees were optimistic that the number of LGBTQ+ people making complaints to health boards could be used in an evaluation. While this is promising, we were unable to speak with individuals within the Welsh Government who could confirm whether or not this information is recorded.
- In section 18.4, internal interviewees stated that the evidence reviews in Action 18.4 should highlight whether LGBTQ+ people face discrimination in healthcare and whether this affects the care they receive. In particular, interviewees felt the evidence reviews should focus on whether LGBTQ+ people are adversely affected by some conditions more severely than non-LGBTQ+ people. If health inequalities are found with interviewees giving the example of trans people being more affected by heart conditions then this could lead to reforms to screening, awareness, and staff training. Interviewees cautioned that service users are not always asked about their sexual orientation or gender identity when receiving health or social care, meaning that the data available is of a poorer quality. This means that the evidence reviews may not be as conclusive as they can be for other marginalised groups with data that is more consistently collected.
- 6.38 Overall, internal and external interviewees suggested that qualitative fieldwork, with focus groups a popular suggestion, would be needed to gain a deeper understanding of LGBTQ+ experiences in Welsh healthcare. The outcomes for Action 18 are solely focused on LGBTQ+ patient perceptions, which would be

difficult or impossible to interpret through HIW, CIW, and other monitoring data – meaning that qualitative fieldwork is required. However, some interviewees suggested that *Llais* – *the Citizen's Voice Body for Health and Social Care* could play a role in the evaluation, with some suggesting their patient experience reports could inform the evaluation of the LGBTQ+ Action Plan for Wales (Llais, n.d.). Whether *Llais* intend to report on LGBTQ+ experiences of health and social care is unclear.

Action 19: Ensure maternity and fertility services are accessible and straightforward to use for LGBTQ+ people

6.39 Internal and external interviewees recognised that the language of "timely" access to gamete storage and accessing fertility treatment "equally" is not specific enough. This could be rectified by policymakers before the evaluation. In addition, internal interviewees warned against attempting to measure patient experiences in this policy area. This is because people cannot compare their experiences with other groups – such as LGBTQ+ and heterosexual families comparing their own access to services – nor can they measure an individual's change over time because interventions are usually short. When considering maternity, internal interviewees recognised that no outcomes refer to them directly – and suggested that an outcome focusing on ensuring LGBTQ+ voices are heard when developing maternity policy and that there are more equal outcomes and experiences would be welcomed. However, internal interviewees stated that LGBTQ+ maternity data is not currently collected – although there is progress being made here.

Action 20: Ensure the development of the new mental health strategy takes account of LGBTQ+ people

6.40 External interviewees frequently raised the topic of mental health among LGBTQ+ people in Wales, often linking it to bullying in schools, gender service waiting lists, and experiences of hate crimes. Internal interviewees also recognised the far-reaching and cross-departmental nature of mental health policy in Wales. Internal interviewees suggested that the activities are already being implemented during the development of the new mental health strategy for Wales. Internal interviewees were confident that this strategy will be formally evaluated, and that this would take into account LGBTQ+ issues. If this is not published before the evaluation of the LGBTQ+ Action Plan for Wales, the monitoring and quarterly progress reports linked to the mental health strategy could still inform the LGBTQ+ Action Plan's evaluation.

Action 21-22: Publish and act on a new HIV Action Plan; Overcome barriers to LGBTQ+ people accessing sexual health services

Both internal and external interviewees welcomed the HIV Action Plan. They also welcomed the widespread use of postal testing across Wales, due to its effectiveness and usefulness for monitoring characteristics of those who test – as online registration can efficiently ask people their sexual orientation, gender identity, and other relevant data. Internal interviewees were confident that the plan will be formally evaluated upon its completion in 2026, and that this could inform the evaluation of the LGBTQ+ Action Plan. In the meantime, its implementation is tracked internally – through a document called *The HIV Action Plan implementation progress update*. In addition, there is ongoing work to survey the well-being of people living with HIV in Wales. Interviewees stated that it will be administered in early 2024 and repeated annually over the next few years, with its results potentially informing the evaluations of the LGBTQ+ Action Plan and the HIV Action Plan.

Action 23: Review the Gender Identity Development pathway for young people in Wales

- 6.42 External stakeholders expressed concern that the activities in this action are worded vaguely and will not achieve the action's outcomes, which are that young trans people are able to access healthcare services that are focused on clinical need and evidence. In particular, external interviewees stated that a gender service for young trans people in Wales could be considered and dismissed, and that this would not increase the access of young trans people to healthcare that is based on clinical evidence and need. All external interviewees who spoke on this topic were concerned by Welsh trans children being referred to NHS England with a widespread perception that NHS England's services were not rooted in clinical best practise and believed that the outcomes of the plan could only be achieved by the establishment of a Gender Service for young people in Wales.
- 6.43 The Welsh Health Specialised Services Committee (WHSSC) were identified as the key decision-making body on this issue however, they were not interviewed for this evaluability assessment. Interviewees suggested that WHSSC's reasoning for its policy on a Welsh Gender Service for young people in Wales should inform the evaluation.

Action 24: Continue to develop the Wales Gender Service

Interviewees were confident that improvements to the Wales Gender Service (WGS) could be evaluated as part of the evaluation of the LGBTQ+ Action Plan. Interviewees stated that data from the WGS could be available to evaluators on waiting times, patient-reported outcome measures (PROMs), and patient-reported experience measures (PREMs). External interviewees stated that experiences of the WGS are overwhelmingly positive and improving, due in part to the monthly meetings held between the WGS and trans representatives. It was suggested that anonymised feedback from these meetings and focus groups with trans people with experience of the WGS could inform the evaluation of the LGBTQ+ Action Plan.

Action 25: Improve the data recording and change processes for maintaining trans, non-binary and intersex people's medical records.

This action was not subject to detailed discussion in the interviews, however, one interviewee stated that this activity relies upon wider reforms and upgrades to the Welsh NHS's IT infrastructure.

Theme E: Inclusive Education (Actions 26-29)

Action 26: Provide national trans guidance for schools and local authorities

6.46 Internal interviewees emphasised that the Transgender Guidance for Schools aims to ensure that trans people feel safe, valued, and included in education settings. This means it focuses on trans people feeling listened-to, supported, understood, and involved in decision-making – rather than solely focusing on transphobic bullying. In addition, internal interviewees stated that the Transgender Guidance for Schools will be evaluated – likely with a pilot and primary research. Otherwise, the SHRN dataset was highlighted as having the potential to help inform the evaluation by indicating the experiences of trans and non-binary pupils in schools.

Action 27: Support LGBTQ+ young people and tackle homophobic, biphobic, and transphobic bullying

6.47 Interviewees widely agreed that quantitative data on bullying is strongly affected by reporting rates. In addition, interviewees suggested that data on homophobic, biphobic, and transphobic bullying incidents is not collated by the Welsh

Government or most Local Authorities. Interviewees therefore recommended surveys, interviews, and focus groups with LGBTQ+ pupils to understand their degree of confidence in reporting bullying and this leading to positive change. Some external interviewees expressed concern with the outcome of "LGBTQ+ young people are confident to challenge bullying and discrimination", suggesting that it could have unintended consequences and place LGBTQ+ young people at risk of further discrimination.

Action 28: Design and implement a whole school approach that is fully LGBTQ+ inclusive

- Internal and external interviewees widely agreed that ensuring schools have the resources needed to implement LGBTQ+ inclusive guidance, including the RSE Code and the statutory guidance for governing bodies of maintained schools, would be a major challenge that should be considered when evaluating the LGBTQ+ Action Plan. In addition, ensuring these resources are available in Welsh and English in partnership with Adnodd, the arms-length body established to oversee education resources in Wales was also identified as an important part of the LGBTQ+ Action Plan. Measuring whether teachers feel confident and supported when implementing a whole school approach that is fully LGBTQ+ inclusive was recognised as challenging, with some interviewees stating that an ongoing research project could help answer these questions.
- 6.49 Internal and external interviewees expressed frustration at the lack of strong evidence regarding LGBTQ+ experiences in schools. To remedy this they suggested that the SHRN dataset could among certain age groups ask sexual orientation and more detailed gender identity questions. An internal interviewee suggested that the four regional education consortia in Wales could be contacted by evaluators of the LGBTQ+ Action Plan to organise interviews with trainers and teachers. An alternative approach suggested by some interviewees was to contact trade unions directly to share surveys and interview invitations with teachers, with the goal being to evaluate teacher confidence and resourcing on LGBTQ+ issues.

Action 29: Ensure that all colleges and universities in Wales are LGBTQ+ inclusive environments for learners, students and staff

6.50 Interviewees stated that universities tend to have established LGBTQ+ networks. It was suggested that these networks – such as Student Union LGBTQ+ groups – could inform an evaluation.

Theme F: Communities, Private and Family Life (Actions 30-37)

Action 30: Support the family lives of LGBTQ+ people

Interviewees stated that the 'Parenting: Give it Time' campaign has been recently updated to include new pages providing information for LGBTQ+ families. The number of page visits is monitored and could be used in an evaluation, however, the pages does not ask visitors if they found useful content or any other way of measuring impact and satisfaction. Interviewees suggested that the promotion and signposting of the webpage by stakeholders is key to its success.

Action 31: Support the LGBTQ+ youth work sector

- 6.52 Interviewees engaged in youth work emphasised its importance for building confidence, understanding their rights, contributing to educational and personal development, and supporting young people. One external interviewee noted that LGBTQ+ youth clubs can be the only time that a young LGBTQ+ person experiences not being the minority group in a room and that this experience builds communities and self-assurance.
- 6.53 There are only a few youth work centres which are LGBTQ+ specific and most youth workers do not formally monitor the sexual orientation of those who attend. This means that monitoring data cannot provide a full picture of the impact of youth work. However, interviewees were enthusiastic about recruiting LGBTQ+ young people for focus groups through youth work settings and using these to measure the impact of youth work and other services. However, internal interviewees did warn that the causal impacts of youth work can be difficult to prove, as they often take a long-time to materialise.

Action 32: Support open dialogue between faith groups and LGBTQ+ people

6.54 This action was not subject to detailed discussion in the interviews.

Action 33: Ensure that LGBTQ+ Welsh speakers have access to Welsh medium support services

Interviewees stated that this action reflects existing legislative requirements and policies, notably the Welsh Language (Wales) Measure 2011. Internal interviewees welcomed this action but did not think it should play a central role in the evaluation of the plan from a Welsh-language perspective. Instead, they emphasised the impact upon the language of interventions in education, culture, and other policy areas.

Action 34: Provide support for LGBTQ+ people to participate in democracy, including standing for elected positions

Internal interviewees stated that increasing the number of LGBTQ+ representatives in elected office would mean that more LGBTQ+ voices are represented in decision-making and its outcomes and that this means that policies will therefore be more likely to represent the needs of all protected characteristics. Interviewees stated that the Access to Elected Office Fund – which may be renamed by the time of the evaluation of the LGBTQ+ Action Plan – and Equal Power Equal Voice programmes are being reformed and expanded to better support LGBTQ+ people in participating in the democratic process. An important part of this is to ensure that LGBTQ+ people do not face toxicity and abuse – inperson or online - when participating in democracy. Interviewees cautioned that the response rate for the 'Local Government Candidates Survey' is low. There are ongoing efforts to increase engagement. In addition, there is no existing ability to filter the responses of unsuccessful candidates from those who were elected. This means that the survey should be used with caution by evaluators.

Action 35-36: Support Pride organisations across Wales; Use LGBTQ+ awareness events to amplify LGBTQ+ voices

6.57 Internal interviewees stated that support for Pride organisations across Wales involves grants of £1,200 to £5,000 per applicant. The small grants mean that arduous surveys and intense monitoring of these events is challenging. An internal interviewee suggested that the funding of Pride events could be targeted in Welshlanguage areas, to ensure that underserved Welsh-speaking LGBTQ+ people are supported – helping to support the outcomes of Action 40. This could be considered by evaluators.

Action 37: Support LGBTQ+ Veterans of the Armed Services

- 6.58 Both internal and external interviewees stated that the activities in this Action have already been completed. In addition, with the LGBTQ+ Independent Review consultation period closing and Welsh Veterans being very well-represented in the consultation interviewees stated that the Outcome focusing on the Independent Review has been achieved.
- 6.59 Internal interviewees suggested that whether the support group for LGBTQ+ veterans in Cardiff and the Vale of Glamorgan and the Cwm Taf area continue to meet should be considered by the evaluation as should whether similar support

groups are established in other parts of Wales. It was proposed that the Welsh Government and Fighting with Pride's current focus is to work on new ways to support LGBTQ+ Veterans in Wales, including by ensuring that LGBT veterans who served between 1967 to 2000 are aware of the two-year window to apply for restitution.

An external interviewee suggested that signing-up veterans organisations and hubs to the 'Pride In Veterans Standard' (PIVS), which supports them and certifies them for being LGBTQ+-aware, would be a good way to monitor outcomes. However, this is not an action in the plan and thus is a decision for policymakers.

Theme G: Participation in Welsh Life: Culture and Sport (Actions 38-41)

Actions 38-39: Improve the representation, inclusion, and participation of LGBTQ+ people in sports; Improve the access and participation of transgender people in sport

- 6.61 Interviewees emphasised that there is very little data about the presence of LGBTQ+ members of boards, the workforce, and volunteers in the sports sector. This makes the outcome regarding LGBTQ+ representation in sport difficult to measure. In addition, external interviewees emphasised that it is important to measure not only how many LGBTQ+ are in the sports sector, but also how "out" or visible they feel they can be. This requires qualitative fieldwork, such as interviews with LGBTQ+ people working and volunteering in sport.
- 6.62 Regarding transgender inclusion in sport, interviewees suggested that reviewing the number of National Governing Bodies of sports with inclusive and exclusive transgender policies could inform the evaluation. However, it is also important to recognise that the implementation of trans-inclusionary policies is just as important one interviewee identified Welsh football as having a trans-inclusionary policy for young footballers that some clubs are unaware of. This can lead to exclusionary behaviour even with inclusive policies. Interviewees suggested that focus groups of trans people could be used to complement monitoring data.

Action 40-41: Celebrate and improve the representation of LGBTQ+ communities in the heritage and culture of Wales; Increase the involvement of LGBTQ+ people and organisations in the design of cultural events and activities

6.63 Internal interviewees highlighted the work already being done in Wales to promote the representation of LGBTQ+ people in culture and heritage, providing examples

from the Football Museum for Wales in Wrexham to Pride exhibitions at St Fagan's to a myriad of grassroots cultural events. However, they emphasised that a lack of funding is holding back the sector. In addition, the ability for the Welsh Government to shape and request data from exhibitions is more straightforward in Welsh Government-funded cultural organisations: Amgueddfa Cymru – National Museum Wales, the Arts Council of Wales, the National Library of Wales, the Royal Commission on the Ancient and Historic Monuments of Wales and Sport Wales. Detailed monitoring data from these organisations should be available to the evaluators of the LGBTQ+ Action Plan for Wales – including the number of LGBTQ+ items displayed, exhibitions, and events – and perhaps some data on the number of people who visit LGBTQ+ exhibitions. Beyond these funded organisations, internal interviewees highlighted the Museums Spotlight Survey as useful to evaluators, for it provides data regarding the percentage of museums that have programmed activities or exhibitions relating to each protected characteristic. For greater detail, internal interviewees enthusiastically favoured the idea of case studies of cultural organisations, to learn from their experiences of promoting LGBTQ+ culture.

6.64 External interviewees highlighted the feedback loop that could occur when items donated to cultural organisations are treated sensitively and with respect and this encourages more LGBTQ+ people to trust the cultural organisation and donate their own LGBTQ+ cultural objects. They argued that LGBTQ+ cultural representation will promote self-empowerment of LGBTQ+ people and increase tolerance for LGBTQ+ people among attendees. Interviewees warned against evaluating the promotion of LGBTQ+ culture by simply counting the number of LGBTQ+ exhibitions and items. This risks obscuring the experiences of groups within the LGBTQ+ community, such as black trans men and Welsh-speaking lesbians. In addition, with relatively small numbers, a large donation of many small items could dramatically increase the number of LGBTQ+ collected items without dramatically increasing the quality of the overall collection. Thus, external interviewees also favoured qualitative evaluation methods, in order to best represent the intersectional representation of LGBTQ+ experiences in Welsh culture.

Theme H: Inclusive Workplaces (Actions 42-44)

Action 42: Remove unnecessary personal identifications from recruitment practices

Internal interviewees were confident that the removal of unnecessary personal identifications from recruitment processes was being implemented. There was confidence that non-binary and intersex people would not be required to choose a sex/gender that does not apply to them in Welsh Government recruitment practices at the time of the evaluation. When considering the confidence of LGBTQ+ applicants in the recruitment process, internal interviewees suggested a survey of successful and unsuccessful applicants could be used to determine whether candidates perceive being LGBTQ+ impacted their recruitment experience.

Action 43: Provide equalities training that includes the needs of LGBTQ+ people to all public sector organisations

6.66 This action was not subject to detailed discussion in the interviews. Training was discussed in the context of other themes, notably health, policing, and education.

Action 44: Encourage private sector employers to be LGBTQ+ inclusive

- Internal interviewees noted that working conditions in the Welsh private sector are a non-devolved area. This means that the Fair Work division within the Welsh Government collaborates with representative organisations of employers to promote more inclusive and fair workplaces. They cannot mandate increased monitoring of LGBTQ+ inclusiveness, nor mandate policy changes. Instead, the Welsh Government emphasises a non-legislative approach of sharing best practices and promoting businesses to share good practice with each other. This policy area could change drastically, internal interviewees thought, if the UK Government were to change employment laws.
- 6.68 The role of Welsh trade unions in promoting and monitoring LGBTQ+ inclusion was welcomed by internal and external interviewees. They suggested that the evaluation of the LGBTQ+ Action Plan could involve the many equalities networks across the union network to collect qualitative information on LGBTQ+ experiences at work.
- 6.69 External interviewees also recognised the difficulties of evaluating LGBTQ+ inclusivity in the private sector. They also noted that while Stonewall's Workplace Equality Index plays an important role in improving standards, it's self-selecting

nature means that it should not be relied upon in an evaluation of the LGBTQ+ Action Plan.

Theme I: Impact of Covid-19 (Actions 45-46)

Action 45-46: In planning and implementing a recovery response to COVID-19, to consider the experiences of LGBTQ+ people, particularly on mental health; Undertake a thorough investigation into how LGBTQ+ people, particularly LGBTQ+ young people and LGBTQ+ disabled people, in Wales have been impacted by the Coronavirus pandemic

6.70 No interviewees chose to discuss this theme.

7. Annex C: Definitions of Theory-based approaches

7.1 Below are the theory-based approach definitions as detailed in the Magenta book for those evaluation option that could be considered for the LGBTQ+ action plan

Realist evaluation

Realist evaluation is an approach to evaluation that seeks to understand not only whether a program or intervention works, but also how, why, and in what circumstances it works. It uses a mixed methods approach to investigate identify patterns in outcomes across different sub-groups of stakeholders. It will then investigate the theoretical mechanisms linking the interventions with the outcomes and understand the contexts why some mechanisms did or did not work as intended. It will ultimately identify which of the 'context-mechanism-outcomes' configurations offer the most robust and plausible explanation of the observed patterns of outcomes.

Process tracing

This uses high volumes of engagement to qualitatively evidence each causal mechanism defined in the Theory of Change, to identify whether an intervention has led to the intended outcomes. It provides a qualitative approach for testing theories on the causal pathway, particularly where they are less well understood, nuanced, and where there are competing explanations of impact.

Contribution analysis

Like process tracing, contribution analysis seeks evidence on the causal mechanisms of the Theory of Change to understand whether the programme causes the intended outcomes. Unlike process tracing, this encourages the use of mixed-methods techniques rather than being purely qualitative. In addition, it will seek to understand the credibility of each explanation, ultimately ruling out those which appear less credible.

Outcome harvesting

Outcome Harvesting collects ("harvests") evidence of what has changed ("outcomes") and then, working backwards, determines whether and how an intervention has contributed to these changes, without having a pre-defined Theory of Change or theoretical impact framework. Outcome Harvesting is useful in complex situations when it is not possible to define concretely most of what an

intervention aims to achieve, or even, what specific actions will be taken over a multi-year period.

Most significant change

This involves developing stories of personal accounts of change and deciding which of these accounts are most important and why for explaining the impact. This is done through iterative stakeholder engagement. It is useful for building consensus on the impacts of programmes where this is complex, as well as identifying which programme aspects are not working well.

7.2 Definitions of Theory based approaches which could not be considered for the LGBTQ+ action plan are below:

Qualitative Comparative Analysis

This approach involves a certain degree of risk. For example, it can require vast amounts of information on case studies and input from stakeholders, however the overall resource requirements may not become clear until the project begins. It is also unclear at this stage whether enough case studies would exist for this approach to be viable. Further, the method cannot be used if there is missing data on any important explanatory factors.

Contribution tracing

This requires the identification of evidence to empirically test whether a proposed claim exists. Considering that the LGBTQ+ Action Plan is likely to be influenced by many complex factors, identifying evidence that meets the required threshold is likely to be a challenge. It also requires a high degree of iterative participation from Welsh Government and external stakeholders to identify and assess this evidence, which cannot be guaranteed.

Bayesian updating

Bayesian updating – which estimates the probability of contribution claims being true through quantitative data and subjective probabilities – requires large amounts of evidence to underpin the estimation of probabilities for each stage of the causal mechanism. It is highly complex, requires stakeholders to be knowledgeable of the technique, and can lead to opaque findings – which are difficult for a wide-range of stakeholders to digest.

8. Annex D: Discussion guides for interviews

8.1 Discussion guide for internal scoping interviews

Introductory questions

1) Firstly, could you please briefly explain your role at the Welsh Government and your current involvement in the LGBTQ+ Action Plan.

Policy rationale

- 2) Where did the Action Plan originate from? Did it seek to overcome any specific emerging issues?
- 3) In your mind, what does success look like?
 - Are there any specific measurable outcomes that would capture success?
- 4) Were any learnings from existing Action Plans used to develop this one? What examples were looked at?

Delivery and implementation

- 5) How was the Action Plan developed?
 - What stakeholders and organisations were involved?
- 6) Do you expect the Action Plan to continue to evolve or change in the future? This is important because a changing programme may have implications for the usefulness of an evaluation which is done at a specific point in time.
 - What big changes to we expect in the next few years?
 - Is the Action Plan expected to be revised periodically, like a strategy?
- 7) Is there any budget planned to fund the activities and actions of the Action Plan?
 - How is this budget determined?
 - How is it distributed?

Monitoring and data collection

- 8) Has any existing work been done to collect indicators or data to measure the impact of the Action Plan?
- 9) What data does the WG have access to which could be used to measure key outputs and outcomes?

10)Is there data being collected on the associated costs of implementation and delivery?

Evaluability

11) From your perspective, what key questions should an evaluability assessment seek to cover?

Recruitment of external stakeholders

- 12) In the next phase of work, we will look to contact LGBTQ+ representation organisations and bodies to understand their views on the evaluability assessment. This will also include bodies representing specific subgroups of the LGBTQ+ community, such as disabled people and ethnic minorities. Do you have any recommendations on people who we could speak to?
- 13) We will also speak to members of the LGBTQ+ community to understand their lived experiences. Does the WG have any existing engagement panels with members of the public who could be part of this engagement?

Closing remarks

We are now approaching the end of our interview and I want to thank you again for your time and commitment to this study. Do you have anything to add?

8.2 Discussion guide for interviews with Welsh Government officials.

Introductory questions

- 1) Could you tell us about your role within Welsh Government?
 - Prompt A: [If needed] Could you tell us about your team?
- 2) Did you participate in the creation and design of the LGBTQ+ Action Plan?
 - Prompt A: If so, how?
- 3) Do you expect to participate in implementing or monitoring any aspects of the plan?

Ambitions for the plan as a whole.

- 4) If the action plan succeeds as a whole, what broad things do you think will be different in a few years' time?
 - Prompt A: In Wales as a whole?
 - Prompt B: In structures, approaches, and attitudes within Welsh Government?

- 5) In your opinion, what should be measured when considering whether the Action Plan has been successful as a whole?
 - Prompt A: Whether LGBTQ+ people feel like things have improved?
 - Prompt B: Public opinion and attitudes?
 - Prompt C: Funding, services, etc.

Their specified theme:

- 6) Are you familiar with the actions of the Action Plan within [theme that is most applicable]?
- 7) Are you involved in implementing any of the actions of activities within this theme of the action plan? If so, how?

(Agree Actions to discuss and then proceed action-by-action using the table.)

- 8) Based on your understanding, would these activities within this action lead to the outcomes described in the plan?
 - If not, why not?
 - If yes, would they lead to any additional outcomes not described in the plan?
- 9) Can you foresee any negative unintended consequences of the activities within this action?
- 10) Can you foresee any external factors (e.g., money/political) that could (positively or negatively) affect either the Action Plan's activities or outcomes?
- 11) Could the outcomes themselves have further, wider effects upon LGBTQ+ lives in Wales?
- 12) Do you think the implementation of the activities can be measured, and if so how?
- 13) Do you think the outcomes in the action plan can be measured?

(Loop back to Question 8 with a new action until all actions have been discussed)

- 14) Are you involved in any other activities that could help to improve LGBTQ+ lives in Wales but that are not listed in the parts of the Action Plan we have discussed today?
- 15) Do you think that the actions and activities we have discussed today will successfully contribute towards the overarching ambition to make Wales the most LGBTQ+ friendly nation in Wales?

8.3 Discussion guide for interviews with external stakeholders.

Introductory questions

- 1) Would you like to introduce yourself or tell us about how your work or initiatives are linked to the LGBTQ+ Action Plan for Wales?
- 2) Did you participate in the creation and design of the LGBTQ+ Action Plan?
- Prompt A: If so, how?
- 3) Do you expect to participate in implementing or monitoring any aspects of the plan?
- Prompt A: Do you think your role will be focused on any themes within the plan?
 Ambitions for the plan as a whole.
- 4) If the Action Plan is successful, what do you think will be different in a few years' time?
 - Prompt A: In Wales as a whole?
 - Prompt B: In Welsh governance and services?
 - Prompt C: More personally, i.e. for you or your organisation?
- 5) In your opinion, what should be measured when considering whether the Action Plan has been successful or not?
 - Prompt A: Whether LGBTQ+ people feel like things have improved?
 - Prompt B: Public opinion and attitudes?
 - Prompt C: Funding, services, etc.
- 6) Which of the following sections (list the sections) would you like to focus on in today's interview?

Sections

Rights and recognition: a theme discussing human rights – most notably gender recognition, banning conversion practises, and non-binary recognition – alongside measures to increase LGBTQ+ representation in decision-making.

- 7) What would Wales look like if LGBTQ+ human rights were widely understood and recognised?
 - Prompt A: What would be the best way of measuring whether human rights are more widely understood and recognised? Is it asking the public directly,

- measuring some part of their behaviour, or measuring the effects of human rights training events?
- 8) The Action Plan calls for Wales to use all available powers to ban all aspects of LGBTQ+ conversion practices in Wales and seek the devolution of any necessary additional powers. It also aims to explore options to seek the devolution of powers related to gender recognition for trans people. How important is devolving and legislating for these changes for the overall success of the plan?
 - Prompt A: Could the plan succeed in making Wales the most LGBTQ+ friendly nation in Europe even if these powers are not devolved?
- 9) The plan proposes sharing information with LGBTQ+ people about how to assert their human rights. What do you think the impact of this could be?
 - Prompt A: In what context would you expect to see LGBTQ+ people asserting their rights? Would it be at work? In education? Wider society?

Healthcare and social care: a theme focused on improving LGBTQ+ experiences in healthcare – specifically fertility, sexual health, and gender identity services.

- 10) What would Welsh healthcare look like if the LGBTQ+ Action Plan is successful in making LGBTQ+ people feel safe, respected, and understood when using services? What changes would you expect to see?
 - Prompt A: How would you expect these changes to be measured?
 e.g. Surveys, interviews, or quantitative information like waiting lists and treatments?
 - Prompt B: If the interviewee mentioned a specific service: what would these changes look like within [repeat the service they mentioned]?
- 11) What would be different in Welsh social care if the plan is successful in making people feel safe, respected, and understood in social care?
- 12) In your opinion, what would be the best way to measure the success of Gender Services in Wales?
 - Prompt A: Explore options for gender services for trans children and young people in Wales?
 - Prompt B: Waiting times reduced? By how much?

 Prompt C: Specialist centre(s) for trans people or trans care integrated with other healthcare?

Education: a theme focused on increasing LGBTQ+ inclusivity in education and tackling homophobic, biphobia, and transphobic bullying.

- 13) If the action plan is successful, what would you expect to be different in Welsh education sector?
 - Prompt A: Schools.
 - Prompt: B: Colleges.
 - Prompt C: Universities.
- 14) The activities under Action 27 include: professional learning opportunities for practitioners, better data collection, and improved Initial Teacher Education. The outcomes are that LGBTQ+ are a) reporting lower levels of discrimination, b) know how to get support, and c) are confident to challenge discrimination. There isn't a clear link between these activities and outcomes what intermediary outcomes must be true for these outcomes to occur? What assumptions are the activities lying upon?
- 15) How should we measure success when it comes to reducing homophobic, biphobic, transphobic, and queerphobic bullying in schools?
 - Prompt A: Is it about reducing the number of reported incidents, or making sure people know how to report incidents?
 - Prompt B: Is it about support and guidance for schools and teachers' confidence and ability to tackle anti-LGBTQ+ bullying?
- 16) How should we measure whether schools have the tools they need to implement RSE Code and Guidance?

Safety: a theme focused on tackling hate crime, strengthening the relationship between police and LGBTQ+ people, and targeting domestic and sexual violence against LGBTQ+ people. It also includes homelessness.

- 17) The action plan aims to increase safety for LGBTQ+ people. What would you expect to be different if this ambition is successful?
- 18) According to a report published by Stonewall Cymru in 2017, 82% of LGBT people who experienced a hate crime in Wales did not report the incident to the police. The Action Plan proposes removing barriers to LGBTQ+ people reporting hate crimes by improving police procedures, diversifying the range of options to report hate crimes

as an alternative to the police (e.g., trough Victims Support and Wales Hate Support Centre), increasing the diversity of the police workforce, and raising awareness of the importance of reporting hate crimes and the ways of doing so. Which of these ambitions, if any, would you expect to be most effective in increasing the reporting of hate crimes?

- Prompt A: Would it be effective to educate LGBTQ+ about the importance of reporting hate crimes?
- Prompt B: A more trusting relationship between Welsh police and the LGBTQ+ community? Or, reporting hate crimes through alternative organisations to the police?
- 19) How would we know if the Welsh Government is succeeding in tackling LGBTQ+ hate crimes? What outcomes would we expect to see?
 - Prompt A: Fewer hate crimes being reported? More hate crimes being reported?
 - Prompt B: Polling of the LGBTQ+ community?
 - Prompt C: Interviews with LGBTQ+ people who have experienced hate crimes, with them discussing their experience of reporting?
- 20) The plan calls for a forum for police and other enforcement authorities to meet with LGBTQ+ communities and representatives. What do you think the impact of this would be on the relationship between police and the community?
 - Prompt B: What difference would it make if there was a stronger relationship and understanding between the Welsh police and the LGBTQ+ community?
- 21) As part of a wide-ranging homelessness projects evaluation, the Action Plan will aim to evaluate specific LGBTQ+ projects, such as the Welsh-Government-funded Ty Pride project, and gather best practice and principles to share with other local authorities regarding LGBTQ+ homelessness. The Ty Pride project offers supported housing for 16-25-year-olds who identify as LGBTQ+ with support needs. What do you think the impact of this work will be to tackle LGBTQ+ homelessness?
 - Prompt A: What would be the effect of those changes?
 - Prompt B: Do you think a small number of homelessness shelters specifically for LGBTQ+ people would lead to changes across Wales or would their effects remain localised?

Refugees and asylum seekers

22) How would you propose measuring whether Wales is a nation of sanctuary for

LGBTQ+ asylum seekers and refugees?

- Prompt A: How would you propose measuring the impact of inclusivity training for service providers which work closely with refugees and asylum seekers?
- 23) How would you measure the success of Welsh Government when engaging effectively with the UK Governments to fulfil the ambitions in the Action Plan in this area, considering that immigration and asylum are not devolved?

Culture and sport.

- 24)What would it look like if LGBTQ+ communities were better represented and accepted in Welsh cultural life?
 - Prompt A: How could this be measured?
- 25)The action plan aims to ensure that the needs of Welsh language speakers are met in the representation of LGBTQ+ culture. What would this look like if it were successful?
 - Prompt A: Are Welsh-language LGBTQ+ events (e.g. Mas ar y Maes) enough to achieve this goal of representing Welsh speakers in LGBTQ+ culture?
 - Prompt B: Would Welsh Government encouraging Welsh-language media to promote content targeted at LGBTQ+ audiences make a difference?
- 26)The Action Plan aims to improve the access and participation of transgender people in sport. In your opinion, how can we effectively see or measure changes to improve this?
 - Prompt A: In your opinion, what would the impact of inclusive practices look like across sports?

Communities, Private and Family Life

- 27)The Action Plan calls for all people to be able to feel a sense of belonging both to their community and to Wales. With regards to LGBTQ+ people, what does 'belonging to your community' bring to mind?
 - Prompt A: Internal LGBTQ+ community? Welsh-speaking or Black, Asian, and Minority ethnic individuals who are LGBTQ+? Or emphasise local and regional communities?
- 28) What impact would more LGBTQ+ people being represented in elected office have?
 - Prompt A: What about at the level of local authorities?
 - Prompt B: In your opinion, how would that look like in practices?

Employment

- 29)The Action Plan aims to encourage private sector employers to be LGBTQ+ inclusive. In your opinions, how would you best monitor or assess the implementation of inclusive workplace policies across employers? And what would be the impact on LGBTQ+ communities?
 - Prompt A: What would be the impact of working in social partnership with trade unions and employers across Wales to share good practice in relation to inclusive workplaces?
- 30)At a broader level, in your opinion, what would LGBTQ+ inclusivity look like in the workplace?
 - Prompt A: LGBTQ+ voices being heard at work.
 - Prompt B: Trans people feeling safe and supported at work.
 - Prompt C: Adoption policy.

Intersectionality

- 31)The plan commits to an intersectional approach to LGBTQ+ rights. What does this mean to you?
 - Prompt A: Does this commitment to intersectionality mean that the LGBTQ+ Action Plan should be evaluated as part of one larger evaluation of Race, Gender, Poverty, etc action plans?

Unintended consequences.

32)Do you anticipate the Action Plan – or specific parts of it we've discussed today – to result in any unintended consequences?

Debrief

Are there any other comments or questions before we finish?

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