



Disabled service users

25 May 2020

Request for Information.

Thank you for your request received on 1 May in which you asked:

I request the following under the Freedom of Information Act of 2000:

- A) A full copy of all recorded information detailing the services international law expectations under the UN Convention of Rights of Persons with Disabilities regarding its disabled service users.*
- B) A full copy of all recorded information detailing the services British law requirements to its disabled service users under the Human Rights Act of 1998 and the Equality Act of 2010, respectively.*
- C) A full copy of all recorded information detailing the services Welsh law proscribed public sector equality duties to its disabled services users.*
- D) A full copy of all recorded information detailing the services disability awareness, training, anticipatory action, adjustment provisions and access measurements in regards its disabled service users.*

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Information-request@senedd.wales

E) A full copy of all recorded information detailing the services anti- direct discrimination, indirect discrimination, harassment, and victimisation policy regarding its disabled service users.

F) A full copy of all recorded information detailing the services guidance to its employees for interaction with disabled service users with the following disabilities: Asperger's Syndrome, Autism, OCD, Depression, Dyslexia, and communicative or behavioural, social and communication disabilities.

G) A full copy of any recorded information detailing the services pro-disability progress from 1/1/2019 to 1/1/2020 regarding the services performance to its disabled service users.

H) A fully copy of all recorded information detailing the services present disability recruitment and promotion scheme to its disabled services users.

The Senedd is committed to promoting diversity, inclusion and equality of opportunity for staff and the people of Wales. The equality work of the Senedd focuses on the concept of fairness, dignity and respect for all, regardless of age, disability, gender reassignment, marriage/civil partnership, pregnancy/maternity, race/ethnicity, religion/belief, sex, or sexual orientation.

I confirm that the Senedd Commission holds information which relates to parts of your request. However, as I will explain in more detail below, I will be unable to comply with the request because I have estimated that the cost of doing so, i.e. of identifying and extracting the information which you have requested in order to communicate it to you, would exceed the "appropriate limit" under section 12 of the Freedom of Information Act 2000 ("the Act").

The appropriate limit for the Senedd Commission is £600. Applying the permitted hourly rate of £25, this is the equivalent of 24 hours of work. My estimate is that in excess of 600 hours of work would be needed (the equivalent of £15,000) to deal with (just one part of) your request which, of course, greatly exceeds the appropriate limit. This is as a result of the breadth of your request, the volume of information held, and the number of teams and persons whose remit the request covers.

My reasoning for this decision, and an explanation of the time calculation, are set out below.

In order to give a realistic estimation of the potential work needed to respond to this request, I approached the Diversity and Inclusion (D&I) team within the Commission's Human Resources service area.

The D&I Team help staff to produce accessible publications, organise translation, interpretation and communication support, provide advice on having accessible buildings and equipment, and also provide advice and briefings on a range of equality-related topics.

Part F of the request was identified as being the most substantial part of the request and so an assessment was made of the likely costs of responding to that part of your request. A sample exercise involving electronic files and emails was undertaken in order to ascertain the amount of work that would be needed to deal with this one aspect as part of your wider request.

Three members of staff currently work in the D&I team. Over recent years, three other members of staff have also covered the work of the team but only two members of staff were approached to perform this exercise.

The staff members agreed on a list of 15 search terms. The search terms included the disabilities described in part F, as well as other communicative, behavioural and social disabilities. They searched their personal email Outlook accounts, a team shared mailbox, a shared SharePoint folder and their personal OneDrive folders. A total of 36,230 items were located.

Based on a sampling exercise, it took in the region of 60 seconds to review each email/document to determine whether or not relevant information is held. From that sample, our estimate is that it would take 603 hours to gather the information from part of the D&I team in relation to part F only. This time estimate does not include the time which would additionally be involved in extracting the information in order to provide it to you.

As well as the D&I team, I consider that relevant information is likely to be held by other service areas across the organisation, including Estates and Facilities Management, the Engagement Team and the Members Business Support teams. I would stress that these teams have not been approached in order to undertake the estimation exercise because I selected the team most likely to hold relevant information.

In the circumstances we consider the exemption based on the cost of complying with your request would be appropriate. In the case of your current request, the costs are clearly excessive, being over 25 times the "appropriate limit".

I should also make it clear that the fact that we have relied on the exemption under section 12 of the Act does not imply that other exemptions might not, on further consideration, turn out additionally to be relevant.

Having explained the issues that would be involved in complying with your current request, if you have a different or more specific request that you wish to put forward, we will, of course, consider it.

In order for you to consider another request, you may wish to be aware of the information that we have available on our website in the form of annual publications and accreditations from various disability organisations. They include the following:

- We are an accredited Disability Confident Employer, embrace diversity and promote equal opportunities. Further information can be found on our [website](#).
- https://senedd.wales/media/pumjkm2u/dignity-and-respect-policy_e.pdf
- [diversity-and-inclusion-narrative-report-2019-20-en.pdf \(senedd.wales\)](#)
- <https://senedd.wales/commission/commission-publications/>
- [Visitors with autism](#)
- [External Recognition and Rewards \(senedd.wales\)](#)

Yours sincerely

Freedom of Information Manager
Welsh Parliament

Your request has been considered according to the principles set out in the **Code of Practice on Public Access to Information**. If you have any questions regarding this response please contact me. If you feel you have cause for complaint, please follow the guidance below.

Cause for concern or complaint with your FOI response?

If you are dissatisfied with the Welsh Parliament's handling of your request, you can request an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Freedom of Information Manager at:

Information-request@senedd.wales or in writing to

Welsh Parliament
Governance and Assurance
Cardiff Bay
Cardiff
CF99 1SN

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF