



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board



Freedom of Information Request: Our Reference CTMUHB_176_26

You asked:

I am writing to request information under the Freedom of Information Act 2000 regarding Commissioning Policy CP41 – Gender Identity Surgery (Adults), specifically relating to breast augmentation for trans women.

I am requesting the full suite of statutory and clinical documents that underpin the eligibility criteria in CP41 (such as the 24-month hormone requirement and Tanner Stage thresholds).

If any of these documents are "not held," please do not simply state they are "unlocated." Under your Duty to Assist (Section 16), please confirm:

- Whether these records were identified as "missing" during the April 2024 transition.
- The specific date the Health Board last verified the existence of the EQIA for CP41.
- If a "Loss of Statutory Record" report has been filed with the Data Protection Officer or Senior Information Risk Owner (SIRO).

Please provide:

1. The Equality Impact Assessment (EQIA): The full EQIA for CP41 demonstrating compliance with the Public Sector Equality Duty (PSED).

Cwm Taf Morgannwg University Health Board does not hold the information you have requested.

Under section 1(1)(a) of the Freedom of Information Act 2000, a public authority is not required to provide information if it does not hold it.

CP41 (Gender Identity Surgery) does not exist. Gender policies, as featured on our website, are as follows:

- Gender Identity Service for Adults (non-surgical), Commissioning Policy (CP182), June
- Gender Identity Service for Adults (non-surgical), Service Specification (SS182), June 2024.
- NHS Wales Specialist Children and Young People Gender Identity Services
- Publication of the Cass Review Final Report - Stakeholder Briefing

The NWJCC commission all Gender Surgery to the NHSE Surgical specification.

2. The Clinical Evidence Review: The formal paper or evidence summary used to establish Tanner Stage 4 as the "medical necessity" threshold for trans women in Wales.

Information not held: CP41 (Gender Identity Surgery) does not exist. Please see response to Question 1. Tanner Stage 4 is not referenced in the National Service Specification: NHS England » Service specification: Gender Identity Services for Adults (Surgical Interventions)

3. The Health Technology Assessment (HTA): Any HTA or cost-effectiveness analysis conducted regarding the provision of breast implants for this patient group.

Information not held: CP41 (Gender Identity Surgery) does not exist. Please see response to Question 1. The NWJCC commission all Gender Surgery to the NHSE Surgical specification: [NHS England » Service specification: Gender Identity Services for Adults \(Surgical Interventions\)](#)

4. WPATH Compliance Analysis: Any record or "Gap Analysis" showing how CP41 aligns with WPATH Standards of Care.

Information not held: CP41 (Gender Identity Surgery) does not exist. Please see response to Question 1.

5. The Governance Transfer/Due Diligence Record (April 2024): The specific audit or transfer list created when administrative responsibility moved from the WHSSC to the NWJCC. This must confirm which statutory documents (EQIAs/Evidence Reviews) were successfully migrated during the 2024 transition.

Information not held: CP41 (Gender Identity Surgery) does not exist. Please see response to Question 1. The systems utilised by WHSSC transferred fully over to the JCC on 1 April 2024.