



 <p>GIG CYMRU NHS WALES Iechyd Cyhoeddus Cymru Public Health Wales</p>	Name of Meeting Audit and Corporate Governance Committee			
	Date of Meeting 16 December 2025			
	Agenda item: 8.3			
Corporate Risk Register				
Executive lead:		Claire Birchall, Nursing, Quality and Integrated Governance		
Author:		Bethan Osborne, Risk Manager		
Approval/Scrutiny route:		Corporate Risks are scrutinised and updated by the relevant Directorate Senior Leadership Teams. All Executives have had sight of the Corporate Risk Register via BET.		
Purpose				
The Leadership Team have delegated responsibility to scrutinise the Corporate Risk Register on behalf of the Business Executive Team and ensure the ongoing management of corporate risks. This paper provides the corporate risks and any notable updates.				
Recommendation:				
NOTE <input checked="" type="checkbox"/>	CONSIDER <input type="checkbox"/>	RECOMMEND <input type="checkbox"/>	ADOPT <input type="checkbox"/>	ASSURANCE <input type="checkbox"/>
The Committee is asked to:				
<ul style="list-style-type: none"> Note the Corporate Risk Register. 				



Link to Public Health Wales [Strategic Plan](#)

Public Health Wales has an agreed strategic plan, which has identified seven strategic priorities and well-being objectives.

This report contributes to the following:

Strategic Priority/Well-being Objective	All Strategic Priorities/Well-being Objectives
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Summary impact analysis

Equality and Health Impact Assessment	No decision required.
Risk and Assurance	This submission is the Corporate Risk Register.
Health and Social Care (Quality and Engagement) (Wales) Act	This report supports the implementation of the Health and Social Care (Quality and Engagement) (Wales) Act, in relation to the Duty of Quality and Candour by ensuring that the organisations most significant risks are being managed appropriately. They relate to all the Health and Care Quality Standards.
Financial implications	The financial implications of failing to manage corporate risk effectively are significant, both in terms of the potential for loss and also the failure to capitalise on opportunities.
People implications	There are associated risks on the CRR related to DBS and resources to deliver the Strategic Plan.



1. Purpose / situation

This paper presents the organisation's corporate risks highlighting any significant updates that required further discussion and any proposals for the escalation/de-escalation of risks from or onto the Corporate Risk Register. The Corporate Risk Register details the highest-level operational risks that are being managed on a day-to-day basis by relevant Directorate Senior Leadership Teams and their associated Executives. In line with delegated authority from Business Executive Team (BET), Leadership Team consideration provides assurance to the relevant Committees and the Board that corporate risks are being effectively identified, managed and reviewed in congruence with the approved Risk Management Policy and Procedure.

2. Background

The Corporate Risk Register is submitted to the Leadership Team to ensure compliance with the organisation's Risk Management policy and procedure. Where corporate risks are in part addressing any strategic risks, these links are referenced through the risk reporting template on the electronic risk management system. If further assurance or detail is required in respect of interdependencies between strategic and corporate risk registers, this can be requested through the risk management team.

3. Description/Assessment

The following significant points are summarised to support the consideration of the Corporate Risk Register.

New risks proposed to be accepted onto the Corporate Risk Register

- **None**

Existing risks proposed to be accepted onto the Corporate Risk Register

- **2003** - There is a risk that Public Health Wales will fail to achieve our net zero target by 2030 and the carbon negative target by 2035 as set out in the Public Health Wales Long Term Strategy.

This is caused by:



- the inability to accurately measure our carbon emissions within Public Health Wales and therefore to identify where we can focus attention to reduce them.
- inadequate pace and scale of organisational response to reduce our carbon footprint over the next five years.
- failure to effectively engage staff in our carbon reduction work across the organisation.
- lack of dedicated decarbonisation resources across the organisation.
- failure to prioritise resources across the organisation to support actions that would make a measurable difference to the reduction of our carbon emissions.

There is also a potential need for future investment to be able to respond to emerging threats and incidents similar to the Covid-19 pandemic, which will increase our emissions.

The impact will be a failure to achieve net carbon zero by 2030. As a result of not being able to measure accurately, it is also possible that our current carbon emissions are significantly underestimated providing a false position for on our progress towards net zero. This could lead to reputational damage for the organisation.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	16	4

Background

One of the six strategic priorities outlined in our Long-Term Strategy (2023-2035) is Tackling the Public Health effects of Climate Change. As part of achieving this Public Health Wales has published its objectives to support the Welsh Government’s ambition of achieving a net zero NHS by 2030 and has committed to being a carbon-negative organisation by 2035.

Since 2022 Public Health Wales has held a Decarbonisation and Sustainability Action Plan, which outlines the actions taken by the organisation to reduce emissions. Emission factors are used to calculate the amount of pollutant produced by an activity. An emission factor gives the relationship between the amount of a pollutant produced and the amount of raw material processed or burnt. Emission factors are measured in KgCO₂e which indicates kilograms of carbon dioxide equivalent produced. Currently PHW is calculating emission factors using spend-based factors, so the more expensive something is the more CO₂e it is assumed to produce, this will likely improve over time as more accurate data about actual emissions emitted is produced.

The action plans have some progress, and currently work is being taken to develop a new action plan for 2026-2028. However, we recognise the need to do more. A recent evaluation of successive plans, and the organisation’s



annual emissions reporting (via Welsh Government public sector reporting process) indicate that significant work is required if Public Health Wales is to realise its decarbonisation ambitions.

Currently, there is limited resource across the organisation to deliver actions to reduce carbon emissions, with staff taking on work in addition to their existing roles. Future resource requirements are being explored but we believe that the change required needs a whole organisation approach to considering the environmental impact of our work programmes.

The latest data for 2024-25 show that emissions within our organisation are increasing. Whilst some of this is due to more robust reporting mechanisms and revised emissions factors, there remain gaps in the data. Based on current trajectories it is unlikely that we will meet our decarbonisation targets.

Rationale for escalation

If we continue our current trajectory the likelihood of realising this risk is high. Work to reduce emissions requires a whole organisation approach and each Directorate has a responsibility to consider the impact of their work on the environment and take action to reduce their carbon footprint. There is a pressing need to raise the profile of this work if organisational emissions are to reduce.

- **2076** - There is a risk that PHW is unable to meet the legal duties set out in the Equality Act 2010/Public Sector Equality Duty and respond to the needs of the population. This will be because we fail to enable and demonstrate compliance with the newly published Accessible Information Standards.

This is caused by the absence of a corporate role with overall responsibility for Equality, Diversity & Inclusion (EDI) to ensure that a strategic and coordinated approach is adopted and an associated infrastructure is in place to respond to the needs of the population.

The impact will be a fragmented approach to Equality & Inclusion work within PHW and failure to comply with the Public Sector Equality Duty (PSED) including:

- submission of the Annual Equality Report.
- development of the Strategic Equality Plan and its implementation.
- the implementation and monitoring of compliance with the Wales Accessible Information Standards (AIS).
- completion of Welsh Government returns including the Anti-Racist Wales Action Plan, Dementia Action Plan and Learning Disability Action Plan.



This risk may also adversely impact Strategic Risk 2 .

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
12	12	4

Background

Public Health Wales is required by law to demonstrate its compliance with the Public Sector Equality Duty (PSED) by publishing annual equality information and equality objectives every four years. The organisation is also required to consider how its policies and decisions affect people protected by the Equality Act 2010.

The Public Sector Equality Duty (PSED) is a legal obligation which aims to safeguard 9 ‘protected characteristics’ from discrimination both within the organisation and for the benefit of all people in Wales for whom we provide health services, advice and policy (referred to throughout this document as all Wales equalities).

Following the disbandment of the Centre for Equalities and Human Rights (CEHR) in 2019, accountability for equalities and PSED compliance has been split over 2 Directorates (Nursing, Quality and Integrated Governance, People and Organisational Development) but without clear accountability and a dedicated qualified and experienced resource.

Rationale for escalation

The publication of the PSED, the recent publication of the Accessible Information Standards and the Peoples Experience Framework requires us to address the risks of not having a dedicated corporate EDI role and to be able to demonstrate compliance across these areas.

Risk proposed to be de-escalated

- None.

Risk proposed to be closed

- None.

Changes to Risk Scores

- None.



Current Risks on the Corporate Risk Register

- **1533** - There is a risk of reputational damage and failure to effectively implement the Health Impact Assessment statutory regulations that form part of the Public Health (Wales) Act which requires Public Health Wales to give assistance to other public bodies carrying out health impact assessments.

This is caused by a lack of capacity in the WHIASU team and limited knowledge, skills and capacity across PHW, outside of WHIASU, to meet the anticipated high volume of requests for assistance, guidance and training from Welsh Government, internally in PHW and externally from public bodies.

This would result in PHW not being able to fulfil its statutory duties either as a public body carrying out HIAs nor as a body which is required to provide assistance to other public bodies, as well as ineffective implementation of the regulations leading to missed opportunities to reduce inequalities and improve and protect public health in Wales.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	9	4

Progress Update

HIA Project Board 13th October - User Reference Group are reviewing the existing guidance. No major changes are anticipated. Reviewed in Senydd on Nov 18th. Feedback remains positive for the WHIASU activities to support this. Additional resources being developed to support the implementation of the regulations. Project remains well managed, further updates pending the November debate.

- **1541** - There is a risk of harm to service users and employees within PHW, specifically in relation to vulnerable groups such as children and adults, due to the absence of regular disclosure and barring service checks.

This is caused by the organisation not carrying out disclosure and barring service renewal checks in addition to the initial check that is undertaken at recruitment (whilst this is not a legal requirement it is best practice).

This would result in the potential misuse of position of trust, resulting in abuse of service users and potentially employees. Detrimental and adverse impact on levels of public confidence and credibility. Financial implications relating to claims made against the organisation.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
15	10	5



Progress Update

Risk and action were discussed and reviewed at SMT on 04 November.

- **1593** - There is a risk that we are unable to demonstrate that the quality standards and the Duty of Quality are embedded in all aspects of PHW business.

This is caused by organisational capacity and capability to operationalise and embed due to competing priorities.

This will result in noncompliance with the legislative requirements, and a lack of progress in strengthening quality improvement and governance in the delivery of safe services, programmes and functions.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
9	6	2

Progress Update

None provided.

- **1614** - There is a risk that PHW Board and Committees cannot take sufficient assurance that the NHS Wales Executive is carrying out its functions in accordance with the governance framework of PHW. The current hosting agreement provides for an annual accountability report and for RO/AO meetings which may not provide sufficient assurance across the year.

This is caused by the PHW's Assurance Framework currently being in draft form and not yet approved and implemented. The new assurance framework from April will mitigate the risk.

This will result in sanctions imposed in accordance with Legislative/Regulatory Compliance, Reputational damage, Financial implications and data security vulnerabilities.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
9	6	6

Progress Update

None provided.

- **1648** - There is a risk that Public Health Wales will lose access to Primary Care data.



This is caused by Audit+ (the current tool) used to gather primary care data is being discontinued in July 2024 and there will be no further support of Audit+ from March 2026.

This would result in the loss of Audit+ without a replacement equivalent service would lead to PHW being unable to meet its statutory responsibilities.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
20	12	2

Progress Update

- None provided.
- **1678** - There is a risk that the organisation will fail to provide sufficient assurance that it is identifying and managing risks effectively through the endorsed Risk Management Procedure and failing to identify themes and trends.

This is caused by inconsistencies of appropriate utilisation of Datix across the organisation, contrary to the approved process.

This would result in a loss in Board confidence and omission of reportable risks at all levels. In addition, a failure to instigate improvement projects resulting in potential harm to service users, reputational damage and financial implications.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
15	15	4

Progress Update

None provided.

- **1758** - There is a risk of further service disruption due to excessive dust damaging the detectors of the mammography units on the Mobile Breast Screening Units. 1 mobile unit is currently out of service due to this issue. 9 other units could potentially be at risk of failure.

This is caused by dust entering the casing containing the image detector potentially damaging the detector, rendering the machine inoperable.

This would result in delayed and cancelled breast screening appointments. >36 month round length screening time, reputational risk and financial implications (detector costs circa 62k).

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	16	2



Progress Update

Proposal for amendments to air handling, which have been developed and reviewed in collaboration with Vector and shared services engineers, have been provided to Lynton's on 01/10/25. IMT is awaiting Lynton's response before deciding next course of action.

- **1779** - There is a risk that PHW will lose our ability to monitor its impact due to declining survey response rates across many sources of official statistics including the National Survey for Wales, the Annual Population Survey and the Labour Force Survey.

This is caused by declining survey response rates across multiple sources of official statistics.

This would result in the inability to monitor our impact and losing the oversight to be able to manage our resources effectively and be able to make evidence informed decisions about managing our services.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
15	12	6

Progress Update

None provided.

- **1780** - There is a risk that PHW are unable to deliver our digital agenda due to dependencies on national programmes, DHCW and Welsh Government.

This is caused by a lack of governance, programme management, visibility, prioritisation, effective working practices and inconsistency within its partner organisations.

This will result in failure to deliver PHW programmes as our dependencies are not delivered by our partners.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	16	6

Progress Update

None provided.

- **1946** - There is a risk that the organisation will fail to implement a suitable Datix Web replacement that matches the current risk maturity when the system is decommissioned in November 2027.



There is no current funding allocated to procure, develop and implement a replacement system.

This would result in a failure to effectively manage risks resulting in inability to achieve strategic objectives.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
12	12	6

Progress Update

Risk continues to be managed through pro-active routes undertaken by the resource allocated to manage this project. Awaiting consideration at Change Board in November 2025 after which, next steps should become more clear in respect of organisational support.



3.1 Well-being of Future Generations (Wales) Act 2015

This work has been put together following the five ways of working, as defined within the sustainable development principle in the Act, in the following ways:

Hirdymor		Long Term	<i>The effective management of corporate risks supports the longevity of the organisation</i>
Atal		Prevention	<i>The effective management of corporate risks reduces the likelihood or consequence of harm being realised.</i>
Integreiddio		Integration	The identification and management of risks are integrated into decision making activities.
Cydweithio		Collaboration	Owners of corporate risks collaborate within their areas and any relevant Directorates to manage risks effectively.
Cynnwys		Involvement	Senior Managers engage with relevant colleagues to ensure staff are empowered to raise risks.

4. Recommendation

The Committee is asked to:

- **Note** the Corporate Risk Register.