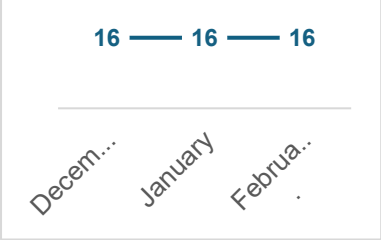


Risk Reference and Link to Strategic Priority	Risk Description			
<p>SRR 5</p> <p>Strategic Priority</p> <p><i>“Enabler Risk and incorporates all Strategic Priorities.”</i></p>	<p>There is a risk that: we fail to fully exploit digital and data fully to improve public health in Wales.</p> <p>Caused by:</p> <ol style="list-style-type: none"> 1. capacity and capability within PHW and external partners. 2. lack of digital and data literacy within PHW as a whole 3. lack of business change capability across Public Health Wales 4. dependency on other organisations <p>Resulting in: Poorer public health outcomes for the people of Wales</p>			
Executive Director Sponsor	Director of Knowledge and Research			
Assuring Committee	Knowledge, Research and Information Committee			
Trend	Current Position of Risk Including Risk Appetite and Risk Decision	Position Statement – Executive Director Update		
 <p>16 — 16 — 16</p> <p>Decem... January Februa..</p>	<table border="1" data-bbox="483 882 1386 987"> <tr> <td style="background-color: #90EE90;">Willing</td> <td>PHW is eager to be innovative and take on a high level of risk, but only in the right circumstance.</td> </tr> </table> <p>Current Score = 16 Target Score = 6 Risk Appetite Level Applied = Willing, therefore, within tolerance level.</p>	Willing	PHW is eager to be innovative and take on a high level of risk, but only in the right circumstance.	<p>The current digital and data portfolio is deliverable within our existing capability and capacity although this is a stretch given the level of change maturity within business areas.</p> <p>There is concern that additional demands risk destabilising delivery and could render the portfolio undeliverable. Managing the scale of change is difficult due to constraints in technical expertise, limited availability of senior management, and inconsistent levels of change management maturity across different business areas. These factors collectively increase the complexity and vulnerabilities of delivering initiatives.</p>
Willing	PHW is eager to be innovative and take on a high level of risk, but only in the right circumstance.			

		Many aspects of the portfolio are dependent on DHCW and active management of the relationship is required for successful delivery
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Internal System of Controls – Linked to ‘Caused By’ section of Risk Description and Source of Assurance			
C1: capacity and capability within PHW and external partners.			
Control Reference	Internal Control	Internal Sources of Assurance	How/When is it monitored?
C1.1	Digital and Data Strategy and Routemap implemented.	D&D Portfolio – Monthly Delivery Confidence Assessment. Quarterly Assurance papers to BET/KRIC	DDDA Digital & Data Portfolio AIDA Change Board BET Board
C1.2	Integration of genomics into our digital and data strategy and delivery routemap has begun.	D&D Portfolio – Monthly Delivery Confidence Assessment. Quarterly Assurance papers to BET/KRIC	DDDA AIDA Digital & Data Portfolio Change Board BET Board

Internal System of Controls – Linked to ‘Caused By’ section of Risk Description and Source of Assurance ¹			
C2: lack of digital and data literacy within PHW as a whole			
Control Reference	Internal Control	Source of Assurance	How/When is it monitored?
C2.1	Migration of our data and analysis to the Cloud is being piloted with a view to a full migration of all our analytical resource to the NDR by December 2026	Assurance and Progress reporting	DARC Programme Board Analysis Project Board Data project board

Internal System of Controls – Linked to ‘Caused By’ section of Risk Description and Source of Assurance ¹			
C2: lack of digital and data literacy within PHW as a whole			
Control Reference	Internal Control	Source of Assurance	How/When is it monitored?
C2.2	Small data science team created and beginning to increase the analytical capability with work now carried out on new tools.	Assurance and Progress reporting	AIDA DARC Programme Board Analysis Project Board
C2.3	R, Python and Power BI established as tools of choice for most new analysis	Assurance reporting	DARC Programme Board DSAB
C2.4	Strategic Workforce Plan agreed	Assurance reporting	BET

Internal System of Controls – Linked to ‘Caused By’ section of Risk Description and Source of Assurance ¹			
C3: lack of business change capability across Public Health Wales			
Control Reference	Internal Control	Source of Assurance	How/When is it monitored?
C3.1	Aligning Digital and Data Portfolio with Strategic Change Portfolio reporting to ensure: One version of the Truth Confirmation of change required Capacity for change identified at an earlier point.	D&D Portfolio – Monthly Delivery Confidence Assessment. Quarterly Assurance papers to BET/KRIC	DDDA Digital & Data Portfolio AIDA Change Board BET Board

Internal System of Controls – Linked to ‘Caused By’ section of Risk Description and Source of Assurance ¹			
C4: Dependency on external organisations			
Control Reference	Internal Control	Source of Assurance	How/When is it monitored?
C3.1	Earlier identification of dependencies on DHCW Active management of DHCW delivery for specific programmes eg LIMS.	D&D Portfolio – Monthly Delivery Confidence Assessment. Quarterly Assurance papers to BET/KRIC	DDDA

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
AP1.1	Create DDaT Job Families and roll out across PHW.	Recruiting the right level of skill to the right roles.	Will bring in a greater talent pool to improve the capability of the existing workforce.	Head of Data Science & Analysis Head of Digital Services	30/06/2027	<p>February 2026 We are developing a training plan for cloud and data (analyst, engineer, scientist, and associated professions like epidemiologists) professions, to support our migration of data, analysis and processes into the cloud. This will give the data professions the skills they need to work in the cloud and build new cloud technical capability in our teams. These training plans will be incorporated into the supporting resources for the job family competency frameworks, and the skills will be reflected in the framework. The plans will initially be rolled out to stakeholders in the Data, Analysis, Registers and Cloud (DARC) Programme.</p> <p>December 2025 Competency framework for data analysis and data science ready for DDDA approval. Delay on data engineering until Principal Data Engineer is in post, 5 Jan 2026. People & OD workstream learning and development matrix will be</p>

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						aligned with the competency frameworks and support the L&D pathways. Cloud professions L&D pathways have been identified to support PHW staff in migration to the cloud. POD job families steering group has been set up.
AP1.2 & AP2.2	Increase technical skill capability into PHW as a result of additional investment.	Successful recruitment of Cloud Engineers, Data Engineers, Developers, Cyber Specialists, Technical Project Managers funded by PHW investment.	Create capacity and depth of skill to meet deliverables of IMTP/BAU requirements.	Governance & General Manager - RDDD	31/12/2025	February 2026 Agency Data Engineer staff in post until 31/03/2026. December 2025 Unsuccessful recruitment for Data Engineers. To meet the shortfall, 2 agency staff have been approved to meet the gap with 1 to be engaged.
AP1.3	Engage technical agency resource to bridge the gap between recurrent resource commencing in post. This is funded using slippage from investment funding only.	Deliverable are progressing using agency provision. Pay budget balances	Use of agency resource will enable key programmes of work to commence/continue whilst recruitment is ongoing.	Governance & General Manager – RDDD	31/08/2025	February 2026 Agency Data Engineer staff in post until 31/03/2026. Action proposed for closure, additional technical staff reflected in Action 1.1 & 1.2. December 2025 Unsuccessful recruitment for Data Engineers. To meet the shortfall, 2 agency staff have been approved to meet the gap with 1 to be engaged.

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
AP1.4	To develop a strategic platform for analytical data processing and a strategic toolset for analysing our data and commenced the training of staff to utilise the strategic toolset.	New platform is in use and staff can utilise the full toolkit.	This will enable more efficient working, and staff will have the fundamental skills to use tools that are available.	Head of Data Science & Analysis	30/06/2026	<p>February 2026 Due to the The GCP environment being managed within the DHCW, there is a dependency on DHCW to deliver some elements of this action.</p> <p>December 2025 DARC Programme remains at amber-red, with the expectation to return to amber at the next programme board, 18 December. Good progress has been made in identifying and planning the areas to migrate to the Google Cloud Platform (NDAP first: RDD, CDSC and medusa. Planning has started to address disaster recovery needs for genomics data. L&D pathways being identified and shared as part of the DARC Programme, to support staff in the migration.</p>
AP1.5	Enhance our capability in creating projections for	NHS planning processes are informed, and policies are developed to	This will both assist with NHS planning and make the case for system and	Head of Data Science & Analysis	31/03/2027	<p>February 2026 Migration of analysis into NDAP is underway and will improve our</p>

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
	diseases and conditions, whilst ensuring that the limitations of projections are understood by users.	allow for changes as identified in outputs.	policy interventions to change course where appropriate.			<p>capability through access to modern tools and technologies for projections and modelling, and through automation, reducing manual processes to free up time for value added analysis.</p> <p>December 2025 An emerging plan has been developed for modelling to support the PHW measurement system / IMTP & strategic priority delivery. Automating updates of existing work to be explored as part of the migration of analysis to the cloud. Analysis of BMI, weight-loss drugs and comorbidities in SAIL underway, comms plan under development.</p>
AP1.6	Establish a Digital, Data and Technology Profession Capability Framework.	Successful recruitment and development pathways for DDaT professions is in place.	This will encourage and embed the technical specialities within both PHW and the NHS and bring talent / skills into the organisation.	Head of Data Science & Analysis Head of Digital Services	30/06/2027	<p>February 2026 See 1.1 update</p> <p>December 2025 Competency framework for data analysis and data science ready for DDDA approval. Delay on data engineering until Principal Data Engineer is in post, 5 Jan 2026. People & OD workstream learning and development matrix will be</p>

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						aligned with the competency frameworks and support the L&D pathways. Cloud professions L&D pathways have been identified to support PHW staff in migration to the cloud.
AP1.7	Deliver the automation roadmap.	Roadmap developed and shared with the organisation so there are clear expectations known.	This will provide the organisation with clarity on what can be expected, by when and by whom.	Head of Data	01/02/2026	<p>February 2026 The automation roadmap is now integrated into the DARC Programme, and assurance will be provided through that programme.</p> <p>December 2025 Automation is an important component of the DARC programme. Work with the priority areas – CDSC, RDD, Medusa, has already identified areas for reducing risk and manual labour through automation, and these will be implemented as part of the DARC Programme.</p>
AP1.8	Deliver Phase 1 of the AI Programme.	PHW staff know which products to use follow guidance to ensure compliance with good practice for safe, legal and ethical adoption of AI	This will provide clear guidance and safe use of PHW approved AI products.	Head of Data Science & Analysis	31/03/2027	<p>February 2026 AIDA is now up an running, Assurance is provided through the Delivery Confidence Assessment. In the last 2 months, 3 significant tools have been approved, subject to final DPIA and cyber sign-off: StopForLife, a smoking cessation</p>

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						<p>app; Gamban, an app to block gambling sites, and ambient voice technology to support note taking for Breast Test Wales.</p> <p>December 2025 Workshop is paused whilst the guidance and good practice is developed. Guidance on generative AI and AI in Research and Development is at the review stage. AI guidance for procurement, and for behavioural science are next to be addressed. An AI Register has been created, which is an important part of our AI assurance. A number of AI tools: including tools for smoking cessation, lung cancer screening, radiology training have been presented at AIDA for approval.</p>
AP1.9	<p>Treat Corporate Risk 1780</p> <p>There is a risk that PHW are unable to deliver our digital agenda due to dependencies on national programmes,</p>	<p>Programmes/activities that have a significant dependency on DHCW remain on track, or early warning if breaches are identified.</p>	<p>Clarity is needed on the role of WG and DCHW and that to be cleared documented. Representation has been strengthened and there is commitment to be more aligned,</p>	Head of Digital Services	31/12/2026	<p>February 2026</p> <p>Specific dependencies that impact deliverables for DARC and DHPP programmes have been escalated to Exec level. PHW continue to engage strategically with national programmes, as evidenced by Exec Director RDD agreeing to chair NDR</p>

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
	DHCW and Welsh Government.		however it remains a gap which may result in under delivery.			<p>Board. However, risks remain that require continuous senior involvement and mitigations that consider alternative options for delivery.</p> <p>December 2025 Quarterly Service Level Agreement meeting and Planning meeting held with DHCW to discuss support response and delivery and to align digital programme routemaps. Ongoing attendance in national programme meetings such as LIMS and National Target Architecture. Escalation process in place within the partner organisations and digital directors. Strengthened our representation at National Programme boards - includes PHW representation at NDR prioritisation board. Early identification has been completed to identify dependencies on DHCW and WG.</p>
AP1.10	Realise opportunities to create more senior management bandwidth.	Specified programmes of work are delivered in line with expectation.	Identifying, sourcing & maximising additional funding where possible will build both capacity and capability to meet demands.	Governance & General Manager RDDD / Head of Operations &	March 2027	<p>February 2026 Temporary senior support in place to support Gambling Harms work. Other programmes will continue to require support at senior level to</p>

Gaps in Assurance / Action Plans for the cause C1 capacity and capability within PHW and external partners.						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
			Sufficient senior management available and utilised to meet organisational change / programme demand capacity.	General Manager HWB		<p>ensure programmes progress in line with target.</p> <p>December 2025 Following successful procurement process additional senior support has been commissioned to commence in January 2026.</p>

Gaps in Assurance / Action Plans for the cause C2 lack of digital and data literacy within PHW as a whole						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
AP2.1	To establish parameters for the efficient and safe use of AI tools across PHW. Providing 'How to' guidance for staff to follow to ensure best practice compliance.	Lack of data breaches reported using approved AI Tools. Efficiencies in time and quality being realised.	PHW will have clear parameters to work to, which should reduce the poor compliance/use of AI capability.	Head of Data Science & Analysis	March 2026 (Check IMTP deliverable)	<p>February 2026 The AI Design Authority has approved the implementation of an AI register, which is now up and running, the next step is to establish the process for it's use, and for the implementation of AI tools in PHW. A paper on AI policy will be presented to AIDA at the next meeting in April.</p>

Gaps in Assurance / Action Plans for the cause C2 lack of digital and data literacy within PHW as a whole						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						<p>December 2025 On track. Guidance on generative AI and AI in Research and Development is at the review stage. AI guidance for procurement, and for behavioural science are next to be addressed. An AI Register has been created, which is an important part of our AI assurance.</p>
AP2.2	See AP1.2					
AP2.3	Digital & Data processes are documented in line with standards.	New processes will be documented at the point of release as a reference tool for the organisation. This will drive consistency of process and maintain compliance.	There is a formal standard process to follow. This will build confidence and skill for users to be able to follow an approved organisational approach.	Head of Data	30/09/2026 <i>Completed, to be closed</i>	<p>February 2026 This action is proposed for closure following the Dec updated.</p> <p>December 2025 Data documentation – this is complete for CDSC, Medusa and RDD data science and analysis, using the approved template. Purview (automated data cataloguing) has been approved for use by DHCW, and</p>

Gaps in Assurance / Action Plans for the cause C2 lack of digital and data literacy within PHW as a whole						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						implementation will commence in February.
AP2.4	Build a Digital and Data Apprenticeship pathway from entry level to degree level	An established career pathway within PHW and partners to 'build and develop' technical capability.	Bring opportunities to school leavers that are non-traditional NHS roles. Established pathways for PHW to be an employer of choice for technical specialities.	Governance & General Manager - RDDD	31/12/2026	<p>February 2026 Level 3 Apprentice in User Centred Design now in post. Work to build DDaT pathways is factored as part of the RDDD Workforce Plan.</p> <p>December 2025 Interviewing process in progress for L3 apprentice. Workforce plan updated and when approved completion dates may be amended.</p>
AP2.5	To develop and deliver more modelling tools including scenario modelling, screening demand, modelling impact of interventions.	Outputs will be shared with stakeholders to develop policies and plans will reflect the modelling outputs.	Improved decision making and policy development that will benefit stakeholders/users and the population of Wales.	Principal Data Scientist	31/03/2027	<p>February 2026 Due to the SAIL being managed within the DHCW tenancy, there is a dependency on DHCW to deliver some elements of this action.</p> <p>December 2025 ON TRACK</p>

Gaps in Assurance / Action Plans for the cause C2 lack of digital and data literacy within PHW as a whole						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
AP2.6	Maximise the use of M365 tools and/or automation to support internal efficiencies, process improvements and data capture.	DDDA and AIDA sighted on new software being proposed for purchase and assess against current in house paid tools. AIDA will be sighted on AI and Automative tools. Both will be able to drive embed controls. Training for staff on using M365 products from DHCW being promoted.	Utilising and realising the use of M365 suite of tools that are available as part of the tenancy, to drive efficiency and collaboration across the organisation without incurring additional expense.	Head of Digital Services / Head of Data	31/03/2027	February 2026 Due to the M365 tools being managed within the DHCW tenancy, there is a dependency on DHCW to deliver some elements of this action. December 2025 Group formed to discuss support models for automations in PowerApps. Meetings held with NHS P&I developers to understand their mechanisms for support and development.

Gaps in Assurance / Action Plans for the cause C3 lack of business change capability across Public Health Wales						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
AP3.2	Manage the transition to using a new national cancer patient data form (WCDS) as a main data source into the existing WCISU	WCISU cancer registration quality and timeliness do not appreciably deteriorate in terms of time to complete a single calendar year of registrations. There is no	Minimise or eradicate the risk of worsening timeliness and quality of WCISU population-based cancer registration.	Director of WCISU/Public Health Consultant WCISU	31/03/2027	February 2026 As part of the registry work of the DARC programme, a series of workshops have been conducted. Workshop outcomes

Gaps in Assurance / Action Plans for the cause C3 lack of business change capability across Public Health Wales						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
	<p>cancer registration system (CATRIN), through CATRIN developments with NHS England, and input to the governance processes of WCDS implementation.</p> <p>2) Risk of worsening data quality as a result of new WCDS use and the consequent impact on WCISU cancer registration</p>	deterioration of UK and Ireland Association of Quality Indicators for the WCISU cancer registry as WCDS is introduced				<p>include drafting of a Roadmap High-level Plan (2026-2028) that includes: modernisation, digitisation of Population-Based Disease Registries, and prioritising the timeliness of the Cancer Registry. This will be presented to DARC in March 2026. The digitisation outlined in the draft Roadmap is intended for the Cancer Registry to comply with international standards using automated coding, classification via AI and deep language learning models. Additional collaborations have commenced on the digital and AI route.</p> <p>December 2025</p>

Gaps in Assurance / Action Plans for the cause C3 lack of business change capability across Public Health Wales						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						<p>Early indications that the 2023 registrations partially derived coming from WCDS are of better quality than anticipated, although concerns remain.</p> <p>WCISU and Pan-Registries Collaborative are now engaged in early stages of scoping for 2026/27 onward DARC Programme Board and IMTP registry developments that will contribute to improving registry timeliness whilst maintaining adequate data quality and standards.</p> <p>WCISU are represented at strategic and operational level at further improvements in phase 2 of WCDS</p>

Gaps in Assurance / Action Plans for the cause C3 lack of business change capability across Public Health Wales						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						development. In part, this is aimed at improving the MVP's issues contributing to poor functionality, and poor data quality, completeness and inefficiencies.
AP3.3	Commence the implementation of Clinical and Digital Safety Standards.	No harm caused as an outcome of new processes being implemented.	All new processes will have been assessed against clinical and digital safety standards to avoid harm as part of the change process. Gaps in assurance will be identified early and mitigations implemented.	Public Health Consultant / Head of Digital Services / Digital Clinical Safety Officer	31/03/2027	February 2026 The DCSO continues to support high profile programmes according to prioritisation from digital team and executive. The current priority programme is Digital Health Protection. However, the DCSO is now at capacity and additional requests cannot currently be actioned without additional resource. The DCSO is also in the process of organising training to selected colleagues in PHW in quarter 2 of

Gaps in Assurance / Action Plans for the cause C3 lack of business change capability across Public Health Wales						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						<p>2026/27 to increase the knowledge and capacity for ensuring digital clinical safety. There remains gaps in the governance process for the DCISO, although, a new Clinical Governance group hosted by the OMD is expected to resolve this. In the meantime, alternative pragmatic solutions have been agreed, for example within the Digital Health protection Programme.</p> <p>December 2025 Clinical Risk Management Plans have commenced for top-tier programmes to ensure compliance with Digital Clinical Safety standards. The CDSO remains focused on the agreed priority</p>

Gaps in Assurance / Action Plans for the cause C3 lack of business change capability across Public Health Wales						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						programmes while offering responsive support to other areas as capacity allows. Work is ongoing with RDDD and NQIG to develop strengthened governance arrangements for digital clinical safety across the organisation.
AP3.4	Implement the required actions as detailed under SRR2					See SRR2 Updates.
AP3.5	Each programme to ensure change management had specific and designated funding to meet the requirements.	The programme will be implemented. The changes will have been managed well to ensure that staff, processes, resources are embedded and aligned to organisational deliverables.	Recognition that each programme changes are funded to support staff to embed the new way/different ways of working.	Portfolio/ Change Managers	31/03/2026	February 2026 Programmes managed by RDD are defining their resources and cost requirements and have appropriate governance measures in place to review any change of scope that may arise within the programme. Any changes of scope are managed through

Gaps in Assurance / Action Plans for the cause C3 lack of business change capability across Public Health Wales						
Reference	What Action?	How will we measure efficacy?	How will this action impact/mitigate the risk?	Who is Responsible?	By When?	Progress
						<p>appropriate change management processes within the programme.</p> <p>December 2025 DHPP – A Senior Change Lead was included in the resource profile and Full Business Case for the programme. That resource is now in place.</p>