GIG CYMRU NHS WALES | Iechyd Cyhoeddus Cymru Public Health Wales	**Name of Meeting** Audit and Corporate Governance Committee **Date of Meeting** 16 December 2025 **Agenda item:** 9.2

Integrated Governance Division: Information Governance Performance Report Q2 2025/2026	
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Approval/Scrutiny route:	Stuart Silcox, Assistant Director, Integrated Governance

Purpose

To provide assurance and updates from the Integrated Governance Division for Q2 2025-2026, specifically the following:

- Information Governance Performance Report for Q2 2025-2026
- Update on the progress of the Records Management SharePoint Implementation Programme

Recommendation:

APPROVE	CONSIDER	RECOMMEND	ADOPT	ASSURANCE
☐	☒	☐	☐	☒

The Committee is asked to:

- Receive and **Consider** the Information Governance Performance Report.
- Receive **assurance** that the Records Management SharePoint Implementation Programme is complete, along with the planned approach to benefits realisation.

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
Strategic Priority/Well-being Objective	Choose an item.
Strategic Priority/Well-being Objective	Choose an item.
Summary impact analysis	
Equality and Health Impact Assessment	No Equality and Health Impact Assessment is required.
Risk and Assurance	This report will provide assurance that: The Information Governance Management System is operating effectively. Risks around Information Governance are known and highlighted in Directorate and Corporate (where necessary) Risk Registers, with clear mitigation actions recorded. The Records Management SharePoint Implementation Programme is complete. Reference to: Datix Risk 1453 - There is a risk that PHW will run ineffective and inefficient services through poor record keeping. This will be caused by a lack of a coherent, organisation wide records management system and process.
Health and Social Care (Quality and Engagement) (Wales) Act	This report supports and/or takes into account the Health and Care Quality Standards for Wales.
Financial implications	The Information Governance Performance report outlines the performance of the Information Governance Management System to further reduce the risk of breaches of data protection legislation with the associated risk of significant fines and sanctions from the Information Commissioner. Progression of a corporate approach to Records Management has required financial investment.
People implications	None

1. Purpose / situation

To provide assurance and progress updates from the Integrated Governance Division for Q2 2025-2026, specifically the following:

- Information Governance Performance Report for Q2 2025-2026
- Updates on the Records Management SharePoint Implementation Project Delivery, including the planned approach to benefits realisation.

2. Information Governance Update

Background

The Information Governance Performance Report provides assurance that Public Health Wales maintains an Information Governance System in order to:

- discharge its responsibilities to ensure the security and appropriate use of personal information; and
- demonstrate compliance with data protection legislation.

Executive Director accountability and greater assurance that information risks are addressed is provided by Public Health Wales's designated Senior Information Risk Owner (SIRO), the Director of Research, Data and Digital.

Freedom Of Information Act (FOI)

Under the Freedom of Information Act 2000, the organisation is required to comply with the appropriate release of information within the legislative timeframe. This is generally 20 working days from receipt of the request. However, this deadline is frequently extended legitimately, e.g. when there is a requirement to seek clarification from the requestor or where we are considering an exemption requiring a public interest test.

In quarter 2, 50 requests were received. Of these 50, 4 have been closed - either withdrawn by the requester, or we did not have a response within a reasonable time after asking for clarification. Of the 46 completed requests the number of non-compliant requests has decreased. Four responses (8%) during quarter 2 were non-compliant, a decrease from 5 in quarter 1. The average number of days to respond in quarter 2 was 16 days, which is an increase from 15 days in quarter 1, and so remains within the 20-working day deadline. FOI compliance is closely tracked by a weekly SIRO meeting chaired by the two responsible Directors.

Reasons behind the delays are identified, understood and, where possible, changes are made to prevent similar delays in the future.

The below table shows an overview of all non-compliant FOI requests from Quarter 2 .

FOI	Days out	Dept.	Comments on Response Delay
2025 118	6	Infection Services	A large amount of information was identified and compiled to review and prepare for release one day before the due date.
2025 131	47	Health Protection (environment)	Complex request that involved engaging an exemption and seeking legal advice
2025 147	26	(Health Protection (environment)	Complex request that involved engaging an exemption and seeking legal advice
2025 160	Currently open	Health Protection	Not completed yet, large amount of information originally provided, further information since identified to be part of the request. Considering exemption.

Failure to deliver timely response time for FOI is a key deliverable for PHW. Whilst the complexity of requests provides obstacles to delivering within timeframes, the handling of requests when they are shared within the organisation requires further understanding. Further work has been undertaken to provide understanding across leadership surrounding best practice and how it should be applied. The weekly SIRO meetings keep the timeliness of request handling under constant review and identify areas for further improvement.

Subject Access Requests (SAR)

The organisation has a responsibility to provide personal information if it is requested by an individual in the form of a SAR. The number of requests has decreased since the previous quarter, with an average of 6 days taken to respond and within the target 30-day timescale. There were four requests received and all four were responded to within the 30-day timeframe.

Personal data breaches

There is a requirement under the UK General Data Protection Regulation (UK GDPR), in which PHW is required to risk assess all personal data breaches and

under certain circumstances to report them to the Information Commissioner's Office (ICO), and the data subjects involved.

All personal data breaches are reported on Datix and are automatically flagged to the Information Governance Service. A risk assessment is then carried out through a Standard Operating Procedure and if the risk assessment suggests that the breach is either ICO or data subject reportable, the breach is referred to the SIRO for a decision.

There were 9 data breaches and 1 near miss reported, however 4 of these breaches related to mis-labelling Symptomatic fit-pack errors on the same date. There were no ICO or data subject reportable incidents during quarter 2.

Further detail on the data breaches has been provided to the Committee in the private session.

Mandatory Information Governance Training

Organisational wide compliance has decreased slightly to 90.50% which is above the NHS target of 85%.

Directorates are regularly reminded to ensure that staff maintain complete and up to date Mandatory Information Governance Training as there is a risk that reportable data breaches may occur where staff are not compliant with their mandatory training.

Information Governance - Development and Improvement

PHW has established strong Information Governance assurance processes through the direction of the SIRO and the Executive Director of Nursing, Quality and Integrated Governance and the implementation of the Information Asset Owner (IAO) network across the organisation. Weekly meetings are chaired by the SIRO with the Executive Director of Quality Nursing and Integrated Governance, the Assistant Director of Integrated Governance (Deputy SIRO), the Head of Informatics, the Head of Information Governance and the Lead Cyber Security Manager to review IG performance across the organisation and to discuss current and emerging issues.

At a recent meeting we reviewed the impact and performance of the IAO model of Information Governance since its implementation 18 months ago. While acknowledging the good progress that has been made, we identified areas for improvement to further strengthen our processes:

- The establishment of an Information Governance/Cyber Programme Board to oversee Information Governance and Cyber Security issues and risk management and to approve decisions made on an organisation wide basis. The Board is Chaired by the SIRO and will formally report to the Digital and Data Design Authority (DDDA).
- Strengthening the Information Governance Forum through mandatory attendance for IAOs at its quarterly meetings to continue to disseminate and discuss Information Governance issues, learning and training requirements.
- Improving the efficiency and effectiveness of our Data Protection Impact Assessments (DPIA) system to better support IAOs through a faster approval process, greater transparency and increased compliance with policy and procedures.
- Reiterating the importance of IAOs engaging with the Information Governance Service for expert advice and support at the earliest opportunity and throughout the DPIA process.

These improvements will be communicated across the organisation and will be embedded by the end of Quarter 4. The Committee will be regularly updated on progress and outcomes.

Assurance can be taken that:

- The IG work of PHW continues to progress in line with the revised focus of the SIRO.
- That continual improvement to PHWs IG procedures support the revised focus of the SIRO.

3. Records Management update

The transition to SharePoint as a document store project has concluded, with all Directorates now moved over to SharePoint Online. While work will continue with all Directorates to embed and maintain SharePoint into the normal working culture for Public Health Wales, the use of SharePoint is now considered to be business as usual.

The Records Management Team are developing matrices to evaluate the benefits across PHW of implementing SharePoint. These include how we might measure the amount of staff time saved through more efficient management of records and identifying the impact upon the number, frequency and type of data breaches incurred since implementation. Other benefits which have been realised but not yet quantified include:

- Improved version control

- Supporting safe and secure data sharing and collaboration with internal and external stakeholders
- Streamlined People and Organisational Development processes with documentation now held within a single location
- Established a process for the storage of leavers files to ensure safe and secure storage for the required 6 years retention period
- Reduction in the number of Teams channels created, preventing content sprawl and the loss of records.

A detailed benefits realisation summary will be presented at a future Committee meeting.

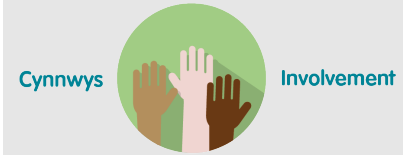
4. Well-being of Future Generations (Wales) Act 2015

Analysis of trends the Information Governance team deal with and a proactive approach to FOI administration alongside a streamlined Records Management is essential to ensure the long-term viability and effectiveness of the organisation.

Training and guidance on best practice plus adherence to Records Management policies will proactively prevent the organisation from failing to comply with legislation including the requirements of the Freedom of Information Act 2000 and the Public Records Act 1958.

Integrated Governance's work is designed to integrate efficient processes and procedures for the benefit of all areas across the organisation.

Integrated Governance works regularly in collaboration with all PHW Directorates, and the Office for National Statistics have shared organisational learning from the recent implementation of a Records Management system.



All parts of the business will be involved in developing the Records Management system to ensure its proper integration across all business areas and all staff are encouraged to provide feedback on the Integrated Governance products they would like to see or any assistance needed.

5. Recommendation

The Committee is asked to:

- **Receive** and **Consider** the Information Governance Performance Report.
- **Receive assurance** that the Records Management SharePoint Implementation Programme is completed as per the project plan along with the planned approach to benefits realisation.