 <p>GIG CYMRU NHS WALES   Iechyd Cyhoeddus Cymru Public Health Wales</p>	<b>Name of Meeting</b>
	Audit and Corporate Governance Committee
	<b>Date of Meeting</b>
	23 March 2026
	<b>Agenda item:</b>
	9.3

<b>Integrated Governance Division: Information Governance Performance Report Q3 2025/2026</b>	
<b>Executive lead:</b>	Claire Birchall, Executive Director of Nursing, Quality and Integrated Governance.
<b>Author(s):</b>	John Lawson, Head of the Information Governance Service

<b>Approval/Scrutiny route:</b>	Stuart Silcox, Assistant Director, Integrated Governance Leadership Team
---------------------------------	--

<b>Purpose</b>
To provide assurance and updates from the Integrated Governance Division for Q3 2025-2026, specifically the following:
- <b>Information Governance Performance Report for Q3 2025-2026</b>

<b>Recommendation:</b>				
APPROVE <input type="checkbox"/>	CONSIDER <input checked="" 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"> <li><b>Consider</b> the Information Governance Performance Report</li> </ul>				

**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:

<b>Strategic Priority/Well-being Objective</b>	All Strategic Priorities/Well-being Objectives
<b>Summary impact analysis</b>	
<b>Equality and Health Impact Assessment</b>	No Equality and Health Impact Assessment is required.
<b>Risk and Assurance</b>	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.
<b>Health and Social Care (Quality and Engagement) (Wales) Act</b>	This report supports and/or takes into account the <u>Health and Care Quality Standards for Wales</u> .
<b>Financial implications</b>	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.
<b>People implications</b>	None

## 1. Purpose / situation

To provide assurance and progress updates from the Integrated Governance Division for Q3 2025-2026, specifically the following:

- Information Governance Performance Report for Q3 2025-2026
- Updates on Records Management (SharePoint).

## 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 sometimes 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.

The below table shows an overview of all non-compliant FOI requests from Quarter3 .

FOI	Days out	Dept.	Comments on Response Delay
2025 174 Digital spend & devices	49 Days	IT, Facilities, International Policy, POD, Business & Performance	Initial figures provided by IT and Facilities were queried by Finance & Policy and International Health. The returns required cross organisational input and sign off via Director of Knowledge and Research

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 increased since the previous quarter, with an average of 18 days taken to respond and within the 30-day timescale. There were 14 requests received and 13 were responded to within the 30-day timeframe.

There is a noticeable trend towards dissatisfied staff members seeking to use the provisions of data protection legislation to potentially build employment cases against the organisation. PHW has received a number of such cases in the previous 12 months which are highly complex and detailed requests. Each one takes a significant amount of time and resource to handle, not just within the Information Governance Service but also the wider organisation.

Discussions are taking place between the DPO and the SIRO to agree an appropriate way forward.

### 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 7 data breaches reported, with 3 incidents being reported to the ICO or data subject during quarter 3.

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

### **Mandatory Information Governance Training**

Organisational wide compliance as of the end of the reporting period was 89.8% 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.

Improvements from this work include:

- A refresh of the Information Governance Forum to share information and opportunity with Information Asset Owners across the organisation.
- A refresh of the DPIA process to improve efficiency and to ensure appropriate IG input at the earliest stage for earlier expert advice and efficiency.

These improvement opportunities form part of our ongoing work programme, alongside the work with the Digital team around Cyber. They 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.

### **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.

As staff become more competent in using SharePoint, the team are continuing to receive requests to develop sites further and enhance user experience as well as collaborative working across directorates and across the organisation.

Over the next year, the Records Management Team will be looking to understand where the organisation is still utilising hard copy records, whether they are current or historical and how we can reduce this and encourage digitisation.

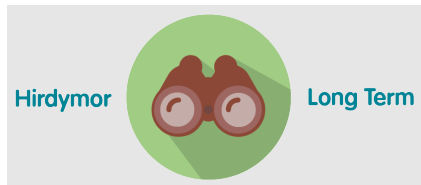
The team will also be looking to expand on the current Retention and Destruction Schedule as work programmes change, we know different record types will be in use that do not have set requirements for archive or deletion. The team will work with directorates and their representatives to understand the gaps in the current schedule, and to add more relevant document types for the work in progress.

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:

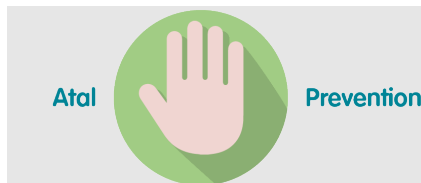
- Improved version control
- Supporting safe and secure data sharing and collaboration with internal and external stakeholders
- Streamlined People and Organisational Development processes with documentation now held within a single location
- Established a process for the storage of leavers files to 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.

### 3. 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.*

### 4. Assurance

Assurance can be taken that:

- The IG work of PHW continues to progress in line with the revised focus of the SIRO, and evidenced by key deliverables around FOI, SAR and data breach metrics.
- That continual improvement to PHWs IG procedures support the revised focus of the SIRO.



## 5. Recommendation

The Leadership Team is asked to:

- **Consider** the Information Governance Performance Report