

 GIG CYMRU NHS WALES Iechyd Cyhoeddus Cymru Public Health Wales	Name of Meeting Audit and Corporate Governance Committee Date of Meeting 3 Spetember2026 Agenda item: 8.2
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Integrated Governance Division: Information Governance Performance Report Q4 2025/2026	
Executive lead:	Claire Birchall, Executive Director of Nursing, Quality and Integrated Governance.
Author(s):	John Lawson, Head of the Information Governance Service

Approval/Scrutiny route:	Stuart Silcox, Assistant Director, Integrated Governance. Received at Leadership Team on 18 June 2026.
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Purpose
To provide assurance and updates from the Integrated Governance Division for Q4 2025-2026, specifically the following: - Information Governance Performance Report for Q4 2025-2026

Recommendation:				
APPROVE ☐	CONSIDER ☒	RECOMMEND ☐	ADOPT ☐	ASSURANCE ☒
The Committee is asked to: • Consider and take assurance from the Information Governance Performance Report and note the data breaches were considered in the private meeting of the Committee.				

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 Equality and Health Impact Assessment is required.
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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.
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Health and Social Care (Quality and Engagement) (Wales) Act	This report supports and/or takes into account the <u>Health and Care Quality Standards for Wales</u> .
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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.
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People implications	None
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1. Purpose / situation

To provide assurance and progress updates from the Integrated Governance Division for Q4 2025-2026.

- **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.

There were 63 requests received in Q4, only one of these was out of compliance. Therefore, the compliance percentage for Q4 is 98.4%. This is an increase of 63% (11 total request increase) in amount of FOI requests received from last quarter (Q3). The amount of non-compliant requests has stayed the same from Q3 to Q4; only one non-compliant request in Q3 (98.1%). The Information Governance Service has seen a sizable increase in requests received over the months and this has shown no indication of slowing down.

The below table shows an overview of all non-compliant FOI requests from Quarter 4.

FOI	Days out	Dept.	Comments on Response Delay
2026 055	1	NHSWP&I, Finance, Policy and International Health, Safeguarding	Internal handover meant the response went out for approval on the due date. Discussions then ensued regarding redaction of staff information and as a result the response was released one day late.

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 ensuring a consistent approach across all areas of PHW.

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 12 days taken to respond and within the 30-day timescale. There were 10 requests received and 7 were responded to within the 30-day timeframe. Of the two that were out of compliance, one was a delay in getting the information from the relevant department and the other was a complex SAR involving a member of staff.

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.

It is now clear that many if not all such requests are supported by AI platforms such as ChatGPT and MS CoPilot. This means that the complexities of the requests are on a level not previously seen. The developments are being kept under close scrutiny.

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.

The data breaches were considered at the Private meeting of the Committee.

Mandatory Information Governance Training

Organisational wide compliance as of the end of the reporting period was 89.07% 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

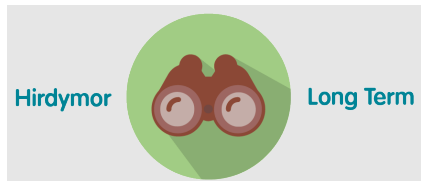
PHW has established strong Information Governance assurance processes through the direction of the SIRO and the Executive Director of Nursing, Quality and Integrated Governance and the implementation of the Information Asset Owner (IAO) network across the organisation. Weekly meetings are chaired by 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.

There is now also a monthly Information Security Board meeting (previously the Cyber Programme Board) under the chairmanship of the SIRO and comprising members of both Digital Services and Information Governance, and also representatives from across the organisation. Whilst this Board is in its infancy it is hoped that this will bring a stronger organisational wide view on matters pertaining to Information Governance.

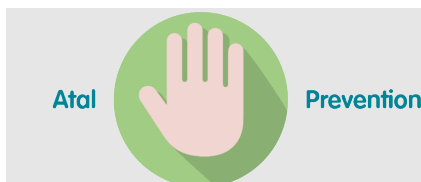
The Head of the Information Governance Service is now developing a three-year plan for the development / improvement of Information Governance across the

organisation. The plan will focus on key areas Governance where improvements are required to mitigate the risks of data breaches and legislative and regulatory non-compliances. It is hoped that the plan will be approved and implementation commenced by the summer.

2. 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.



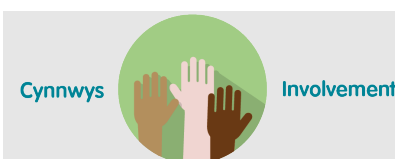
Training and guidance on best practice plus adherence to Records Management policies will proactively prevent the organisation from failing to comply with legislation including the requirements of the Freedom of Information Act 2000 and the Public Records Act 1958.



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.

3. 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.
- Continual improvement to PHW's IG procedures support the revised focus of the SIRO.



4. Recommendation

The Committee is asked to:

- **Consider** and take **assurance** from the Information Governance Performance Report and **note** the data breaches were considered in the private meeting of the Committee.