



Ref: ATISN 27424

25 September 2026

Dear ,

ATISN 27424 – NHS Governance

Thank you for your request to Welsh Government for information received on 27 August 2026 related to NHS Governance and further correspondence on 08 September.

You asked for:

Part A — Welsh Government Oversight of NHS Wales Shared-Services Architecture

1. Governance Framework for NWSSP, DHCW, and Health Boards Please provide:

- The Welsh Government's governance framework defining oversight of:
NWSSP (Shared Services)
Digital Health & Care Wales (DHCW)
NHS Wales Health Boards and Trusts
- Any governance papers, ministerial directions, or oversight protocols relating to shared-services digital infrastructure (Outlook, Teams, SharePoint, ESR).
- Any documentation describing how Welsh Government ensures statutory compliance across FOI, SAR, IG, and digital governance pipelines.
- 2. Accountability for Statutory Compliance Please provide:
- Any Welsh Government reviews, audits, or assessments relating to FOI/SAR statutory performance across NHS Wales bodies.
- Any ministerial briefings or internal papers addressing systemic delays, metadata irregularities, or audit-log access concerns.
- Any correspondence between Welsh Government and NWSSP, DHCW, or Health Boards regarding FOI/SAR breaches or Section 10 defaults.

Part B — Audit-Log Access, Monitoring, and Digital Governance

1. Welsh Government Oversight of Audit-Log Controls Please provide:

- Any Welsh Government guidance, governance papers, or oversight records relating to audit-log access on NHS Wales systems (Outlook, Teams, SharePoint, ESR).
- Any documentation describing how Welsh Government ensures that employer departments (People & OD, Legal & Risk, IG, Digital) cannot access Special Category Data relating to trade union representation.
- Any DPIAs reviewed or commissioned by Welsh Government relating to shared-services monitoring tools or mailbox access controls.

2. Shared-Services Digital Infrastructure Please provide:

- *Any Welsh Government documentation describing the governance model for shared digital platforms used across NHS Wales.*
- *Any risk assessments or DPIAs relating to cross-board data leakage, metadata propagation, or shared-services access rights.*
- *Any internal reviews addressing concerns about retrospective alteration of documents submitted by staff to NHS bodies.*

Part C — Recruitment Transparency & Temporary-to-Permanent Conversions

1. Welsh Government Oversight of NHS Wales Recruitment Practices For financial years 2024/25, 2025/26, and current year to date, please provide:

- *Any Welsh Government audits, reviews, or governance papers relating to recruitment fairness across NHS Wales.*
- *Any documentation addressing temporary, interim, secondment, or maternity-cover roles transitioning to permanent appointments without external advertisement.*
- *Any ministerial briefings or internal papers relating to recruitment transparency concerns within:*

NWSSP

Health Boards

Trusts

DHCW

Corporate/IG/Digital/Data/People & OD directorates

2. Internal vs External Appointment Ratios Please provide:

- *Any Welsh Government records or analyses relating to internal vs external recruitment ratios across NHS Wales corporate roles (Band 3 to Director level).*

Part D — Shared-Services Financial Contributions & Cost Apportionment

1. Welsh Government Oversight of NWSSP Charging Models Please provide:

- *Any Welsh Government documentation describing how NWSSP calculates and apportions shared-services charges to NHS Wales organisations.*
- *Any ministerial approvals, governance papers, or financial oversight records relating to NWSSP's cost-allocation methodologies.*
- *Any internal Welsh Government papers assessing proportionality, value, or justification of NWSSP charges.*

2. Cross-Board Financial Contributions

For 2024/25, 2025/26, and current year to date:

- *Any Welsh Government records summarising total contributions paid by each Health Board and Trust to NWSSP.*

- Any breakdowns by service area (corporate, HR, IG, digital, procurement, recruitment, payroll, etc.).

Part E — FOI/SAR Performance Across NHS Wales

1. *Welsh Government Monitoring of FOI/SAR Compliance Please provide:*
 - Any Welsh Government dashboards, reports, or oversight records tracking FOI/SAR performance across NHS Wales bodies.
 - Any documentation describing how Welsh Government responds to repeated Section 10 FOIA breaches or SAR delays.
 - Any internal reviews addressing systemic issues in statutory compliance.
2. *Ministerial or Senior Civil Service Briefings Please provide:*
 - Any briefings provided to Ministers or senior civil servants relating to FOI/SAR compliance failures, metadata irregularities, or governance concerns across NHS Wales.

Our Response

Part A

Governance Framework for NWSSP, DHCW, and Health

1. The NHS Wales Oversight and Escalation Framework (the Framework) sets out the Welsh Government's approach for gaining assurance from NHS Wales organisations; and the escalation and intervention processes where there are matters of concern that need to be addressed. ([NHS Oversight, Assurance, Escalation and Intervention Framework](#))

A review has taken place of the current framework and a new framework will be published shortly - [Written Statement: 100-day plan commitment – Review of NHS Wales Escalation and Intervention Arrangements \(30 July 2026\) | GOV.WALES](#)

For organisations in escalation, each one, including DHCW have an organisation specific escalation framework – link below contains detail of each organisations escalation level and also links to their frameworks at the bottom of the page - [NHS Wales escalation and intervention arrangements | GOV.WALES](#)

We held a series of public accountability meetings with organisations last financial year, you can find the necessary information for the DHCW meeting as well as a recording of the meeting here - [NHS Wales public accountability meetings | GOV.WALES](#)

Additionally, we have shared a letter which was sent to all NHS Chairs and Chief Executives Officers which sets out a new approach to NHS Wales/Welsh Government oversight and interface arrangements. (See Doc 1)

2. This information is not held by Welsh Government. You may wish to contact individual NHS bodies for the information you are seeking, and you can find their contact details [here](#).

3. Welsh Government is not aware of an SLA being in place.
4. The Welsh Government does not monitor statutory compliance in these areas. These matters are the responsibility of NHS Boards and their leadership teams. Where an organisation fails to meet its statutory obligations in relation to information governance, data protection or freedom of information requirements, the Information Commissioner's Office (ICO) has the power to investigate and take appropriate regulatory action.

Accountability for Statutory Compliance

1-3 Each NHS Wales organisation is responsible for managing its own Freedom of Information (FOI) and Subject Access Request (SAR) performance. The Information Commissioner's Office (ICO) is the UK's independent regulator for information rights. It is responsible for upholding access to information legislation and enforcing data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The ICO oversees compliance, provides guidance to organisations, and investigates complaints where information rights may not have been upheld.

Part B

Audit-Log Access, Monitoring, and Digital Governance

- 1-2** This information not held centrally by Welsh Government. You may wish to contact individual NHS bodies to enquire if they hold the information you are seeking, and you can find their contact details [here](#).
3. Whether a Data Protection Impact Assessment (DPIA) is required is a matter for the NHS organisation concerned as the data controller. Where processing activities meet the thresholds set out in UK GDPR, the organisation is responsible for undertaking an appropriate DPIA and ensuring compliance with its data protection obligations.

Shared-Services Digital Infrastructure

- 1-3** This information not held centrally by Welsh Government. You may wish to contact individual NHS bodies for the information you are seeking, and you can find their contact details [here](#).

Part C

Recruitment Transparency & Temporary-to-Permanent Conversions

Welsh Government Oversight of NHS Wales Recruitment Practices For financial years 2024/25, 2025/26, and current year to date,

- 1-3** Welsh Government does not hold information that falls into scope of your request.

Internal vs External Appointment Ratios

Welsh Government does not hold information that falls into scope of your request.

Part D

Shared-Services Financial Contributions & Cost Apportionment

Welsh Government Oversight of NWSSP Charging Models

1-3 Core services provided by NWSSP on behalf of NHS Wales are funded via a budget top slice model. These adjustments are detailed in the NHS allocations published annually. Charging for services outside that core offering is determined by NWSSP and NHS partners via its Partnership Committee

Health Boards allocations including Shared Services funding are published here:

[Health board allocations | GOV.WALES](#)

Cross-Board Financial Contributions. *For 2024/25, 2025/26, and current year to date*

1. Contributions via allocation top-slice are detailed in annually published NHS allocations.

Any other contributions are a matter for NWSSP and partners

2. Welsh Government does not hold these except those detailed in published allocations

Part E

FOI/SAR Performance Across NHS Wales

1. We have provided a response relating to this as part of the text provided under Part A
2. We have interpreted this request to refer NHS bodies and therefore the response is as above and response the same as Part A
3. We are not aware of any internal reviews being undertaken to address systemic issues in statutory compliance.

Ministerial or Senior Civil Service Briefings.

You have requested sight of Ministerial or Senior Civil Service briefings related to a number of different matters. We do not hold any briefings in relation to the matters you have specified.

Next Steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely,