

Dear

ATISN 27575 – Civica UK Limited

Thank you for your request to the Welsh Government for information under the Freedom of Information Act (2000) received on 25 September 2026 relating to NHS Wales' dependency on Civica UK Ltd for recruitment management (TRAC). You requested the following:

SECTION A — Civica Dependency Map (All Systems + All NHS Wales Bodies) This section requests confirmation of the full organisational and system dependency landscape across NHS Wales.

1. NHS Wales Organisations Using Civica TRAC Please confirm all NHS Wales organisations using Civica TRAC, including:

- ✓ Aneurin Bevan University Health Board
- ✓ Swansea Bay University Health Board
- ✓ Cardiff & Vale University Health Board
- ✓ Cwm Taf Morgannwg University Health Board
- ✓ Hywel Dda University Health Board
- ✓ Betsi Cadwaladr University Health Board
- ✓ Powys Teaching Health Board
- ✓ Velindre University NHS Trust
- ✓ Welsh Ambulance Services NHS Trust (WAST)
- ✓ NWSSP (Shared Services Recruitment)

2. Other NHS Wales Bodies Using Civica Systems Please confirm any documentation relating to Civica systems used within:

- ✓ Public Health Wales
- ✓ Health Education and Improvement Wales (HEIW)
- ✓ Digital Health and Care Wales (DHCW)
- ✓ Any other NHS Wales bodies using Civica governance, OH, conflicts of interest, document management, analytics, or operational systems.

3. Civica Systems Used Across NHS Wales and the UK Public Sector Please confirm any documentation held by Welsh Government relating to Civica systems used within NHS Wales or integrated with NHS Wales systems, including:

- ✓ TRAC Recruitment Management System ✓ Civica Occupational Health (OPAS) ✓ Civica Meeting Management (Governance) ✓ Civica Conflicts of Interest (NHS) ✓ Civica Document Management (Clinical Records) ✓ Civica Electronic Patient Records ✓ Civica Prescribing ✓ Civica Clinical Pathways ✓ Civica Analytics ✓ Civica Case Management ✓ Civica Election Services ✓ Civica Stakeholder Engagement ✓ Civica Property Management ✓ Civica Fleet Management ✓ Civica Contract Management ✓ Civica Income Management ✓ Civica Digital Mail ✓ Civica Master Data Management

4. Civica Corporate Footprint

Please provide any documentation held by Welsh Government relating to:

- ✓ Civica UK Ltd's acquisition history (37+ companies in 10 years)*
- ✓ Civica's public-sector customer base (6,000+ organisations)*
- ✓ Civica's role as a multi-system provider across health, care, government, housing, education, elections, and community services*
- ✓ Any assessments of Civica's scale, reach, or aggregated influence within NHS Wales digital architecture*

5. Aggregated Vendor Dependency

Please provide any documentation assessing:

- ✓ the combined dependency created when multiple NHS Wales functions rely on a single private vendor*
- ✓ cross-system integrations (e.g., TRAC + Civica Occupational Health + governance systems)*
- ✓ any risk assessments relating to multi-system vendor concentration*
- ✓ any digital governance concerns relating to reliance on Civica for recruitment, occupational health, governance, conflicts of interest, document management, analytics, or patient-related systems*

SECTION B — Welsh Government Oversight, Compliance & Assurance 1. Welsh Government Oversight of TRAC and Civica Systems Please provide any documentation describing Welsh Government's oversight role in relation to:

- ✓ TRAC recruitment governance*
- ✓ Civica system governance*
- ✓ NHS Wales digital assurance*
- ✓ Workforce transparency and fairness*
- ✓ Recruitment compliance monitoring*
- ✓ Any statutory or policy-based oversight responsibilities*

2. Reports Received by Welsh Government

Please provide:

- ✓ all reports Welsh Government receives relating to TRAC recruitment governance*
- ✓ all reports Welsh Government receives relating to Civica system performance*
- ✓ all reports Welsh Government receives relating to NHS Wales recruitment transparency, fairness, or compliance*
- ✓ any dashboards, summaries, or analytics provided to Welsh Government by NHS Wales bodies or Civica*

3. Reliance on Reports for Compliance Assurance Please provide any documentation describing:

- ✓ whether Welsh Government relies solely on reports provided by NHS Wales bodies or Civica*
- ✓ whether Welsh Government independently verifies recruitment governance data*
- ✓ whether Welsh Government has access to TRAC data directly*

- ✓ whether Welsh Government has access to Civica system-level data
- ✓ any limitations Welsh Government has identified in relying on TRAC-generated reports

4. Powys Teaching Health Board's Admissions Powys Teaching Health Board has stated publicly (via FOI) that:

It cannot produce internal/external recruitment ratios; It cannot produce corporate recruitment data; It cannot produce departmental recruitment data; It cannot produce historic recruitment datasets; It cannot produce transparency or fairness metrics; TRAC does not provide the required reporting fields; TRAC does not allow Powys to extract the required governance data

Please provide:

- ✓ any Welsh Government documentation assessing these admissions
- ✓ any Welsh Government actions taken in response
- ✓ any Welsh Government assessments of whether other NHS Wales bodies face the same limitations
- ✓ any Welsh Government assessments of whether reliance on TRAC reporting affects national workforce governance
- ✓ any Welsh Government assessments of whether Civica's reporting limitations affect compliance with Welsh Government workforce policies

5. Welsh Government Assurance of Recruitment Governance Please provide any documentation describing:

- ✓ how Welsh Government assures recruitment governance when NHS Wales bodies cannot extract required data
- ✓ how Welsh Government validates recruitment fairness, transparency, and compliance
- ✓ how Welsh Government ensures national workforce governance standards are met
- ✓ any risk assessments relating to incomplete recruitment data across NHS Wales
- ✓ any mitigation plans relating to TRAC reporting limitations

SECTION C — Digital Governance, Assurance & Risk (Welsh Government)

1. System Ownership & Digital Governance Position

Please provide Welsh Government's governance position on the use of Civica TRAC across NHS Wales, including any digital assurance statements, governance papers, or risk assessments relating to third-party ownership of core recruitment infrastructure.

2. Metadata, Reporting & Audit-Trail Governance

Please provide any documentation describing:

- ✓ governance of recruitment metadata held by Civica
- ✓ audit-trail assurance
- ✓ reporting limitations
- ✓ validation of governance metrics when NHS Wales does not own the system
- ✓ any assessments of how recruitment transparency, fairness, or internal/external ratios are governed when the data is held externally

3. Resilience & Continuity Planning

Please provide any documentation relating to:

- ✓ TRAC system outages
- ✓ third-party system failure
- ✓ national recruitment continuity
- ✓ interoperability fallback arrangements
- ✓ any risk assessments relating to TRAC usage across NHS Wales

4. Third-Party Access & Data Protection

Please provide any documentation assessing:

- ✓ Civica's access to NHS Wales recruitment data
- ✓ data-flow mapping
- ✓ privacy, security, and access controls
- ✓ compliance with Welsh Government digital governance standards
- ✓ any assessments of Civica's access to recruitment, occupational health, governance, conflicts of interest, or clinical data

5. Interoperability with NHS Wales Systems

Please provide documentation describing:

- ✓ TRAC integration with NHS Wales systems
- ✓ Civica Occupational Health integration
- ✓ Civica governance systems integration
- ✓ assurance of interoperability and data safety

6. Digital Assurance & Risk Assessments

Please provide:

- ✓ digital assurance papers
- ✓ risk registers
- ✓ governance reviews
- ✓ third-party dependency assessments

Held by Welsh Government relating to Civica UK Ltd systems used within NHS Wales.

Response

Welsh Government do not hold this information.

Civica UK Ltd's systems are procured by NHS Wales Shared Services Partnership (NWSSP), which may therefore hold the information you seek. You can find their contact details [here](#)

The Welsh Government does not monitor the use of digital systems and has no role in most procurement processes.

Next Steps

The request you sent me contains personal information about you - for example, your name and address. The Welsh Government will be the data processor for this information and, in accordance with the General Data Protection Regulation, it will be processed in order to fulfil our public task and meet our legal obligations under the Act to provide you with a response.

We will only use this personal information to deal with your request and any matters which arise as a result of it. We will keep your personal information and all other information relating to your request for three years from the date on which your request is finally closed. Your personal information will then be disposed of securely.

Under data protection legislation, you have the right:

- to be informed of the personal data we hold about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

For further information about the information which the Welsh Government holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ
Email: DataProtectionOfficer@gov.wales

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,