

Digital & Data Strategy

Final Internal Audit Report

2024/25

Public Health Wales NHS Trust



Reasonable Assurance

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Review Reference

Fieldwork

Executive Sign Off

Audit Committee

Executive Lead

Audit Team

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17 December 2024

January 2024

Iain Bell, Director of Knowledge & Research

Paul Dalton, Head of Internal Audit

Martyn Lewis, IT Audit Manager

Executive Summary

Purpose

To consider the implementation and delivery of the digital and data strategy (the 'Strategy').

Overview

We have concluded reasonable assurance on this area. The key matters requiring management attention are:

- There is no separate digital risk register, and no explicit risk within the corporate risk register that clearly articulates the risks relating to the delivery of the digital and data strategy.
- We note some areas of slippage within the Strategy which may impact on the overall delivery, could result in sub-optimal decisions, or decisions made for quick, tactical, fixes as opposed to strategic, systemic improvements.

Full details of matters arising are detailed within the Findings & Agreed Action Plan. The following opportunities for enhancement have been identified that do not impact the overall opinion and are highlighted for management information:

- A defined process should be established for moving digital functions from a development state into operational.
- Consideration should be given to standardising the processes and tools used for operational management of the delivery of the Strategy.

Scope & Assurance Summary

Objectives

		Related Findings	Assurance
1	The control and governance structure for digital ensure appropriate risk management, monitoring and reporting on the delivery of the strategy, decision making and ownership of digital.	1	Reasonable
2	The digital and data strategy is being implemented appropriately.	2	Reasonable
3	Barriers to the successful implementation of the digital and data strategy have been identified and managed.	1	Reasonable

Management Actions

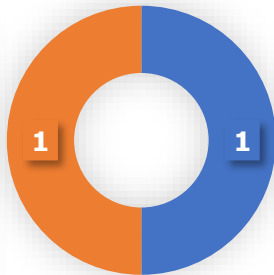


High Priority



Medium Priority

Themes



■ Risk Management

■ Strategy

■

Risk Types

Public Perception & Reputational Risk

Findings & Agreed Action Plan

Objective 1: The control and governance structure for digital ensure appropriate risk management, monitoring and reporting on the delivery of the strategy, decision making and ownership of digital. **Reasonable**

Overview / Summary of Observations

The Digital & Data Strategy is publicly available with shared ownership of decisions and collaboration as key themes.

A routemap for delivery of the Strategy has been defined, which identifies priority areas, whilst acknowledging the capacity of the organisation and the constrained financial situation. Although the full cost for delivery of the Strategy is not stated within the routemap, funding for delivery of the Strategy is stated as to be partly business as usual, and partly by project specific funding requests with collaborating organisations, such as Welsh Government.

Delivery of the Strategy is monitored by the Knowledge, Research and Information Committee, with regular reports showing progress against the routemap. Although we note that reporting on cyber security is to the Audit and Corporate Governance Committee due to the integration with risk.

Ownership of digital by the wider organisation has been improved and is provided by the Trust Digital & Data Design Authority (DDDA), which includes membership from across the organisation, and which oversees delivery of digital programmes.

The management structure for digital has been revised recently with a split of the hardware and operational aspects sitting under finance and the development, strategy delivery, and cyber aspects sitting within the Knowledge and Research Division. This split in management, while providing benefits, may increase the complexity of moving items from development state into operation, and so will need a defined process in place.

Routemap reporting includes consideration of risks and uncertainties which include financial risks, technical debt (the accumulating cost of not updating information systems and equipment), and the reliance on external partners. The DDDA also tracks risks to the digital programmes. The corporate risk register includes a risk on the siloing of data and consequent loss in the ability of the organisation to use its data. We also note that individual programmes include identified risks. However there is no separate digital risk register, and no explicit risk within the corporate risk register that clearly articulates the risks relating to the delivery of the Strategy.

Key Findings	Risk & Impact	Agreed Management Action
<p>1 Risk management</p> <p>There is no separate digital risk register, and no explicit risk within the corporate risk register that clearly articulates the risks relating to the delivery of the digital and data strategy.</p>	<p>Risks to the successful delivery of the strategy, and consequence to the organisation may not be effectively managed.</p>	<p>Agreed Action: There is an existing Corporate risk on failure to maximise the use of digital and data to maximise public health outcomes. We will review our management of this risk and align risks from our major digital projects and operational digital risks into an aligned section of our risk management process.</p> <hr/> <p>Expected Evidence of Implementation:</p>

		Digital section of risk register and evidence of DDDA managing these risks
	Medium Priority	Officer: Director of Research, Data and Digital
Theme: Risk Management	Control Operation	Date: 30/4/25

Overview / Summary of Observations

The September 2024 routemap update reported that governance boards for each major workstream had been established. Our fieldwork confirmed that these are operating. The governance boards monitor the projects within their workstream and report into the DDDA, which keeps a record of projects and a defined reporting schedule for reporting progress.

Operational level management is undertaken by workstream leads, with tracking of progress and actions undertaken by a variety of methods including Excel, MS Planner and Miro boards. We note regular contact between leads and delivery teams, but the variation in tracking methods may result in some loss of clarity in the reporting function.

The Strategy is ambitious and will entail a lot of work to deliver. We reviewed progress against the aims of the Strategy and against specific actions and note that in general there is good progress across all themes.

We note some areas of slippage which may impact on the overall delivery of the Strategy, result in sub-optimal decisions, or decisions made for quick, tactical, fixes as opposed to strategic, systemic improvements. These slippages are:

- The Strategy includes a cloud strategy, but there appears to be a lack of skills to deliver this. As the cloud architecture provision may impact on systems development workstream, among others, there is a risk that developments may result in applications based on older technology, which may not be easily migratable to the cloud.
- Although work on automation has progressed, the automation programme has slipped, with no organisation wide prioritised assessment of needs. We also note that there is a lack of guidance over the use of automation or AI, which may increase the risks of data leakage and silos, particularly given the NHS Wales access to Office 365 tools such as Power Automate and Power BI.

Key Findings		Risk & Impact	Agreed Management Action
2	<p>Progress</p> <p>We note some areas of slippage within the Strategy which may impact on overall delivery, result in suboptimal decisions, or decisions made for quick (tactical) fixes as opposed to strategic, systemic improvements.</p>	<p>Delivery of the Strategy may not result in digital transformation.</p>	<p>Agreed Action: We have strengthened programme management to ensure that slippage is minimised. We will also strengthen DDDA monitoring of the portfolio to minimise the risk of tactical solutions.</p>
		<p>Medium Priority</p>	<p>Expected Evidence of Implementation: From DDDA minutes and actions.</p>
	<p>Theme: Strategy</p>	<p>Control Operation</p>	<p>Officer: Director of Research, Data and Digital Date: 30/4/2025</p>

Overview / Summary of Observations

The barriers to the successful implementation of the Strategy are generally known by management, and specific actions are underway in order to manage and mitigate the most significant of these. The key barriers that have been addressed with specific actions are:

- The lack of a vision for digital can be a barrier and so the Strategy provides a corporate vision for digital.
- The inability to implement digital solutions that meet use needs is addressed, with the Strategy being clear on the need to become more agile. Recruitment and training has been provided on agile concepts in order to address this.
- Management identify cyber security as a challenge. We note that new staff have been recruited and progress is being made against the cyber improvement plan.
- Siloing of information and people has been identified as a barrier. The Trust has undertaken work to remove these, with the Strategy identifying an aim to improve collaboration. We note increases ownership of the strategy by BET and the creation of the DDDA and the creation of a digital assurance process helping to mitigate this issue.
- Collaboration between digital and the rest of the organisation has been recognised as a barrier. The DDDA helps with collaboration. We also note that a user centred design team has been created.

Although the key barriers are known by management, there are some other known significant barriers which persist despite management actions. These may impact on the delivery of the Strategy and digital transformation. They are:

- The Strategy acknowledges the technical debt, but legacy systems remain a barrier due to the increased support requirements and potential to introduce cyber security vulnerabilities. We note that there a systems development plan, but until legacy systems are retired this will continue to be an issue.
- A lack of skills and staff is an acknowledged barrier which could impact on delivery. We note that recruitment has occurred in key areas and work is ongoing to develop a directorate workforce plan in order to address this barrier.
- Insufficient budget is a barrier. We understand that funding for digital is through both normal business of the Trust and by seeking funding on a case by case basis for specific projects, which may lower management's ability to effectively plan strategically. We acknowledge that this is a wider issue within NHS Wales.

As actions are underway to manage these barriers, we have not raised a specific matter here, however these should be included within the risk management process that we have identified in key finding 1.

Appendix A

Assurance Opinion

	Substantial	Few matters require attention and are compliance or advisory in nature. Low impact on residual risk exposure.
	Reasonable	Some matters require management attention in control design or compliance. Low to moderate impact on residual risk exposure until resolved.
	Limited	More significant matters require management attention. Moderate impact on residual risk exposure until resolved.
	Unsatisfactory	Action is required to address the whole control framework in this area. High impact on residual risk exposure until resolved.
	Advisory	Given to reviews and support provided to management which form part of the internal audit plan, to which the assurance definitions are not appropriate. These reviews are still relevant to the evidence base upon which the overall opinion is formed.

Prioritisation of Findings

Priority	Explanation
High	Significant risk to achievement of a system objective OR evidence present of material loss, error, or misstatement. Poor system design OR widespread non-compliance.
Medium	Some risk to achievement of a system objective. Minor weakness in system design OR limited non-compliance.

Website: [Audit & Assurance Services - NHS Wales Shared Services Partnership](#)



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