



 <p>GIG CYMRU NHS WALES Iechyd Cyhoeddus Cymru Public Health Wales</p>	Name of Meeting
	Audit and Corporate Governance Committee
	Date of Meeting
	23 March 2026
	Agenda item:
	8.2

Corporate Risk Register	
Executive lead:	Claire Birchall, Nursing, Quality and Integrated Governance
Author:	Bethan Osborne, Risk Manager

Approval/Scrutiny route:	Corporate Risks are scrutinised and updated by the relevant Directorate Senior Leadership Teams. All Executives have had sight of the Corporate Risk Register via BET.
---------------------------------	--

Purpose
The Leadership Team have delegated responsibility to scrutinise the Corporate Risk Register on behalf of the Business Executive Team and ensure the ongoing management of corporate risks. This paper provides the corporate risks and any notable updates.

Recommendation:				
APPROVE <input type="checkbox"/>	CONSIDER <input type="checkbox"/>	RECOMMEND <input type="checkbox"/>	ADOPT <input type="checkbox"/>	ASSURANCE <input checked="" type="checkbox"/>
<p>The Audit and Corporate Governance Committee is asked to:</p> <ul style="list-style-type: none"> Take assurance that the Corporate Risk Register is being scrutinised appropriately. 				



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
Strategic Priority/Well-being Objective	All Strategic Priorities/Well-being Objectives
Strategic Priority/Well-being Objective	All Strategic Priorities/Well-being Objectives

Summary impact analysis

Equality and Health Impact Assessment	No decision required.
Risk and Assurance	This submission is the Corporate Risk Register.
Health and Social Care (Quality and Engagement) (Wales) Act	This report supports the implementation of the Health and Social Care (Quality and Engagement) (Wales) Act, in relation to the Duty of Quality and Candour by ensuring that the organisations most significant risks are being managed appropriately. They relate to all the Health and Care Quality Standards.
Financial implications	The financial implications of failing to manage corporate risk effectively are significant, both in terms of the potential for loss and also the failure to capitalise on opportunities.
People implications	The people implications of failing to manage corporate risks effectively are significant, both in terms of the potential implications to staff and also the failure to capitalise on the effective deployment of the workforce.



1. Purpose / situation

This paper summarises the organisation's corporate risks highlighting any significant updates that required further discussion and any proposals for the escalation/de-escalation of risks from or onto the Corporate Risk Register. The Corporate Risk Register details the highest-level operational risks that are being managed on a day-to-day basis by relevant Directorate Senior Leadership Teams and their associated Executives. Leadership Team consideration provides assurance to the relevant Committees and the Board that corporate risks are being effectively identified and managed.

2. Background

The Corporate Risk Register is submitted to the Leadership Team to ensure compliance with the organisation's Risk policy and procedure. Where corporate risks are in part addressing any strategic risks, these linkages are referenced through the risk reporting template on the electronic risk management system. If further assurance or detail is required in respect of interdependencies between strategic and corporate risk registers, this can be requested through the risk management team.

3. Description/Assessment

The Corporate Risk Register was submitted to the Leadership Team on the 19th February 2026. The following significant points have been summarised to indicate the outcome of the decision making at Leadership Team.

New risks accepted onto the Corporate Risk Register

- None

Existing risks accepted onto the Corporate Risk Register

- **2144** - There is a risk that service users may have a clinical procedure undertaken or make decisions on planned care without being fully informed if the All-Wales consent process is not adhered to. This could be from direct service delivery in PHW or as a result of national advice & guidance being published by PHW without taking consent and decision making into consideration.



This is caused clinicians or PHW staff potentially not following the latest guidance as detailed in the All Wales consent and decision making policy and procedure.

The impact might be poor quality service, service user harm, financial implications (claims) and reputational damage.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
12	9	4

Background

The All-Wales Consent to Treatment Policy is designed to ensure that all Healthcare professionals in Wales adhere to a consistent approach when Obtaining consent from patients. This policy is crucial for safeguarding patient rights and ensuring that individuals are fully informed about their examination and treatment. Informed consent is a legal requirement in the provision of high-quality, person-centred care and in achieving good outcomes for patients as envisaged by the Duty of Quality. A Wales-specific consent e-learning package was developed by the Welsh Risk Pool and launched in 2023, with the expectation that health bodies in Wales ensure staff utilise this resource and embed it into their practice.

It was identified during a Welsh Risk Pool audit that consent training has not been applied to all roles within PHW where consent is required, e.g. staff who deliver training on procedures, those who write national policy and guidelines and those who undertake medication prescribing.

Rationale for escalation

Escalation to the Corporate Risk Register is recommended due to the risk posed by the lack of assurance that those staff who are involved in service delivery, education and advocacy have the required role specific consent and decision-making competency assigned. Until assurance is obtained there is an increased risk to patient safety, financial implications through negligence claims and reputational damage. Leadership Team approved the risk onto the Corporate Risk Register.

Risk proposed to be de-escalated

- None.

Risk closed

- **1780** - There is a risk that PHW are unable to deliver our digital agenda due to dependencies on national programmes, DHCW and Welsh Government.



This is caused by a lack of governance, programme management, visibility, prioritisation, effective working practices and inconsistency within its partner organisations.

This will result in failure to deliver PHW programmes as our dependencies are not delivered by our partners.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	16	6

Rationale for closure

This risk has been incorporated into Strategic Risk 5. Leadership accepted closure.

Changes to Risk Scores

- **1678** - There is a risk that the organisation will fail to provide sufficient assurance that it is identifying and managing risks effectively through the endorsed Risk Management Procedure and failing to identify themes and trends.

Proposed that the residual likelihood score be **reduced** from **5** to **3**.

- **1946** - There is a risk that the organisation will fail to implement a suitable Datix Web replacement that matches the current risk maturity when the system is decommissioned in November 2027.

Proposed that the residual likelihood score be **increased** from **3** to **4**.

Current Risks on the Corporate Risk Register

- **1533** - There is a risk of reputational damage and failure to effectively implement the Health Impact Assessment statutory regulations that form part of the Public Health (Wales) Act which requires Public Health Wales to give assistance to other public bodies carrying out health impact assessments.

This is caused by a lack of capacity in the WHIASU team and limited knowledge, skills and capacity across PHW, outside of WHIASU, to meet the anticipated high volume of requests for assistance, guidance and training from Welsh Government, internally in PHW and externally from public bodies.

This would result in PHW not being able to fulfil its statutory duties either as a public body carrying out HIAs nor as a body which is required to provide assistance to other public bodies, as well as ineffective



implementation of the regulations leading to missed opportunities to reduce inequalities and improve and protect public health in Wales.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	9	4

Progress Update

The HIA Guide was approved by the Executive Team and will be published on the 24th February 2026.

- **1541** - There is a risk of harm to service users and employees within PHW, specifically in relation to vulnerable groups such as children and adults, due to the absence of regular disclosure and barring service checks.

This is caused by the organisation not carrying out disclosure and barring service renewal checks in addition to the initial check that is undertaken at recruitment (whilst this is not a legal requirement it is best practice).

This would result in the potential misuse of position of trust, resulting in abuse of service users and potentially employees. Detrimental and adverse impact on levels of public confidence and credibility. Financial implications relating to claims made against the organisation.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
15	10	5

Progress Update

The project is currently around two months behind schedule due to low completion rates for staff DBS and Trust ID checks, with significant time being spent issuing repeated reminders and renewing expired links. Additional resource has been deployed to manage this, and Business and Planning Leads have been asked to reinforce the need for colleagues to prioritise completion in order to recover the timetable and prevent further delays.

- **1593** - There is a risk that we are unable to demonstrate that the quality standards and the Duty of Quality are embedded in all aspects of PHW business.

This is caused by organisational capacity and capability to operationalise and embed due to competing priorities.

This will result in noncompliance with the legislative requirements, and a lack of progress in strengthening quality improvement and governance in the delivery of safe services, programmes and functions.



Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
9	6	2

Progress Update

The risk has been reviewed and the Quality Impact Assessment action updated to reflect progress.

- **1648** - There is a risk that Public Health Wales will lose access to Primary Care data.

This is caused by Audit+ (the current tool) used to gather primary care data is being discontinued in July 2024 and there will be no further support of Audit+ from March 2026.

This would result in the loss of Audit+ without a replacement equivalent service would lead to PHW being unable to meet its statutory responsibilities.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
20	12	2

Progress Update

DHCW have committed to continue to support all existing and current Audit+ use cases, but the detail regarding how remains unclear. DHCW have now confirmed an extension to the Audit + contract to Apr-27. The PHW team will continue to define the plans for the end of the contract.

- **1678** - There is a risk that the organisation will fail to provide sufficient assurance that it is identifying and managing risks effectively through the endorsed Risk Management Procedure and failing to identify themes and trends.

This is caused by inconsistencies of appropriate utilisation of Datix across the organisation, contrary to the approved process.

This would result in a loss in Board confidence and omission of reportable risks at all levels. In addition, a failure to instigate improvement projects resulting in potential harm to service users, reputational damage and financial implications.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
15	9	4

Progress Update

Since the last update was provided, a reasonable assurance Internal Audit rating in relation to the management of corporate risks has been received by the organisation. In conjunction with this, targeted communications



have taken place with risk handlers and owners who hold risks at a corporate level, reminding them of the process, governance and purpose of updating via Datix. This is also taking place at Directorate SMT meetings. It is proposed that the likelihood of this risk is reduced to 3, making the risk a 3x3=9, based on the assurance from Internal Audit and increased awareness raising across PHW.

- **1758** - There is a risk of further service disruption due to excessive dust damaging the detectors of the mammography units on the MBSU's. 1 mobile unit is currently out of service due to this issue. 9 other units could potentially be at risk.

This is caused by dust entering the casing containing the image detector potentially damaging the detector, rendering the machine inoperable.

This would result in delayed and cancelled breast screening appointments.>36 month round length screening time, reputational risk and financial implications (detector costs circa 62k).

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	16	2

Progress Update

The risk was considered at Leadership Team on the 19/02/2026. Members were content with the management of the risk.

- **1779** - There is a risk that we will lose our ability to monitor our impact due to declining survey response rates across many sources of official statistics including the National Survey for Wales, the Annual Population Survey and the Labour Force Survey.

This is caused by declining survey response rates across multiple sources of official statistics.

This would result in the inability to monitor our impact and losing the oversight to be able to manage our resources effectively and be able to make evidence informed decisions about managing our services.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
15	12	6

Progress Update

Mitigation actions are ongoing.



- **1946** - There is a risk that the organisation will fail to implement a suitable Datix Web replacement that matches the current risk maturity when the system is decommissioned in November 2027.

This is caused by no current funding allocated to procure, develop and implement a replacement system.

This will result in a failure to effectively manage risks resulting in inability to achieve strategic objectives.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
12	16	6

Progress Update

This project is only considered as 'pipeline' by the organisational change board at the moment, therefore, there is no commitment being demonstrated to take this project forward as a priority within the constraints of the timescales associated with the decommissioning of Datix Web. Therefore, the likelihood score of the target not being reached by November 2027 should increase the residual score to 4 making this risk a $4 \times 4 = 16$. This score exceeds the inherent scoring of the risk, fundamentally due to the discussions taking place outside of PHW with procurement and OfW colleagues. The current resource that was allocated to take this project forward is also due to end the fixed term contract by 31st March 2026.

- **2003** - There is a risk that Public Health Wales will fail to achieve our net zero target by 2030 and the carbon negative target by 2035 as set out in the Public Health Wales Long Term Strategy.

This is caused by the inability to accurately measure our carbon emissions for all activities undertaken in Public Health Wales and understand what areas we can make the greatest impact to reduce carbon emissions. Inadequate pace and scale of organisational response to reduce our carbon footprint over the next five years. Failure to effectively engage staff in our carbon reduction work across the organisation. Lack of dedicated decarbonisation resources across the organisation and failure to prioritise resources across the organisation to actions that would make a measurable difference to the reduction of our carbon emissions. Potential need for future investment in response to emerging threats and incidents similar to the Covid-19 pandemic response which will increase our emissions. Decisions not always prioritising the impact on the environment.

This will result in a failure to achieve net carbon zero by 2030, contributing to the public health impacts of climate change which are within our influence. As a result of not being able to measure carbon emissions



accurately, it is also likely that our current carbon emissions are significantly underestimated providing a false position for Public Health Wales on its progress to net zero.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	16	4

Progress Update

Following review at BET, a decision was made to consider this a risk rather than an issue and the risk description has been rearticulated to reflect this. A meeting is scheduled with the Risk Team on the 10th February to strengthen the reporting at the Climate Change Programme Board and the dependencies between this risk and the related strategic risk.

- **2076** - There is a risk that PHW is unable to meet the legal duties set out in the Equality Act 2010/Public Sector Equality Duty and respond to the needs of the population. It may be unable to enable and demonstrate full compliance with the newly published Accessible Information Standards.

This is caused by the lack of an organisational capacity with overall responsibility for Equality, Diversity & Inclusion to ensure both a strategic and coordinated approach and that an associated infrastructure is in place to respond to the needs of the population.

The impact will be a fragmented approach to Equality & Inclusion work within PHW and non-compliance with the Public Sector Equality Duty (PSED) including:

- submission of the Annual Equality Report;
- development of the Strategic Equality Plan and its implementation;
- the implementation and monitoring of compliance with the Wales Accessible Information Standards (AIS); and
- completion of Welsh Government returns such as the Anti-Racist Wales Action Plan, Dementia Action Plan and Learning Disability Action Plan.

This risk may also further impact on strategic risk 2 if not addressed.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
12	9	4

Progress Update

The action plan has been updated with next scheduled review in March.

- **2143** - There is a risk that we will be unable to deliver an effective long-term sustainable and excellent Environmental Public Health service to the population of Wales.



- The service is provided by Public Health Wales & Environmental Public Health and the UKHSA, underpinned by an MOU signed in 2013. The MOU was later re-negotiated with UKHSA withdrawing from existing informal arrangements to support front line service provision (can be traced to risk ID 1633; risk materialised).
- UKHSA withdrawing from existing informal arrangements to support front line service provision will mean that the EPH service will need to be solely responsible for frontline response both in and out of hours.
- Resource capacity issues within the team.

10/02/2026: Further information below:

UKHSA has historically provided support to Public Health Wales (PHW) for the delivery of the duty desk service as a matter of custom and practice. However, no formal or documented arrangements were ever agreed between the two organisations. Following recent developments relating to the revision of arrangements between UKHSA and the devolved administrations, UKHSA colleagues informed PHW that their frontline support for both in-hours and out-of-hours duty desk provision would cease.

The impacts might be a negative impact on the quality of Environmental Public Health service delivered to the population of Wales, impact on public health, business continuity and resource constraints.

Inherent Risk Rating	Residual Risk Rating	Target Risk Rating
16	12	3

Progress Update

The risk was considered at Leadership Team on the 19/02/2026 and accepted onto the Corporate Risk Register. It was confirmed that monthly updates are provided to the Business Executive Team who have taken responsibility for addressing the risk.



3.1 Well-being of Future Generations (Wales) Act 2015

This work has been put together following the five ways of working, as defined within the sustainable development principle in the Act, in the following ways:

Hirdymor		Long Term	<i>The effective management of corporate risks supports the longevity of the organisation</i>
Atal		Prevention	<i>The effective management of corporate risks reduces the likelihood or consequence of harm being realised.</i>
Integreiddio		Integration	The identification and management of risks are integrated into decision making activities.
Cydweithio		Collaboration	Owners of corporate risks collaborate within their areas and any relevant Directorates to manage risks effectively.
Cynnwys		Involvement	Senior Managers engage with relevant colleagues to ensure staff are empowered to raise risks.

4. Recommendation

The Audit and Corporate Governance Committee is asked to:

- Take **assurance** that the Corporate Risk Register is being scrutinised appropriately.