

 <p data-bbox="379 208 491 338"><b>GIG</b> CYMRU <b>NHS</b> WALES</p> <p data-bbox="520 208 751 338">Iechyd Cyhoeddus Cymru Public Health Wales</p>	<p data-bbox="975 197 1390 309"><b>Name of Meeting</b> Quality, Safety and Improvement Committee</p> <p data-bbox="1098 315 1390 389"><b>Date of Meeting</b> 19 August 2021</p> <p data-bbox="1145 396 1390 461"><b>Agenda item:</b> 3.10</p>
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<h2 data-bbox="260 566 1337 674">Update on the Once for Wales Concerns Management System</h2>				
<b>Executive lead:</b>	Rhiannon Beaumont-Wood, Executive Director Quality, Nursing and Allied Health Professionals.			
<b>Author:</b>	John Lawson, Chief Risk Officer; Stuart Silcox, Assistant Director of Integrated Governance.			
<b>Approval/Scrutiny route:</b>	BET (16/8/21)			
<b>Purpose</b>				
This paper provides an update on the implementation of the Once for Wales Concerns Management System (Datix).				
<b>Recommendation:</b>				
APPROVE <input type="checkbox"/>	CONSIDER <input type="checkbox"/>	RECOMMEND <input type="checkbox"/>	ADOPT <input type="checkbox"/>	ASSURANCE <input checked="" type="checkbox"/>
<p data-bbox="204 1245 1209 1279">The Quality, Safety and Improvement Committee is asked to:</p> <ul data-bbox="252 1323 1390 1547" style="list-style-type: none"> <li data-bbox="252 1323 1390 1435">• <b>Take Assurance</b> that PHW has implemented effective project management and control over the implementation of the Once for Wales Concerns Management System (Datix).</li> <li data-bbox="252 1435 1390 1547">• <b>Note</b> that PHW is awaiting confirmation from DHCW of the delivery date of the cyber security controls prior to completing the rescheduled OFWCMS implementation plan.</li> </ul>				

**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:

<b>Strategic Priority/Well-being Objective</b>	All Strategic Priorities/Well-being Objectives
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<b>Strategic Priority/Well-being Objective</b>	Choose an item.
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<b>Strategic Priority/Well-being Objective</b>	Choose an item.
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**Summary impact analysis**

<b>Equality and Health Impact Assessment</b>	N/A
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<b>Risk and Assurance</b>	This report applies in particular to Strategic Risk 2 'There is a risk that Public Health Wales will cause significant harm to patients, service users or staff members'.
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<b>Health and Care Standards</b>	This report supports and/or takes into account the <a href="#">Health and Care Standards for NHS Wales</a> Quality Themes  Governance, Leadership and Accountability Choose an item. Choose an item.
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<b>Financial implications</b>	Failing to effectively manage 'Putting Things Right' issues could result in claims against the organisation which may be difficult to defend.
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<b>People implications</b>	None
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## 1. Purpose / situation

To fulfil its obligations under the NHS (Concerns, Complaints and Redress Arrangements) (Wales) Regulations 2011, more commonly referred to as Putting Things Right, Public Health Wales uses a system called Datix to record the management and learning from concerns. Over the past few years an all-Wales project has been established to develop a replacement system known as the *Once for Wales Concerns Management System* (OFWCMS), with the project led on behalf of Welsh Government by Welsh Risk Pool (WRP). The system is based on a series of modules and when it was procured Public Health Wales was given the following timeline for delivery:

Claims / Redress / Complaints module	March 2021
Incident Management module	March 2022
Risk Management module	March 2023 (TBC)
Business Intelligence module	TBC

In a meeting led by WRP (who lead on the OFWCMS programme) on 14th July 2020, it was announced that the timeline had been brought forward by direction of Welsh Government (WG), and that, with the exception of risk management, there was now a requirement for Public Health Wales to be ready to transition to all modules by 31<sup>st</sup> March 2021.

Over the period from July until early March 2021, concerns within Public Health Wales were increasing that the project would be unable to deliver a system that was fit for purpose for the needs of Public Health Wales by the stated deadline. These concerns were supplemented by the resource demands of Public Health Wales ongoing Covid-19 response and the resultant unavailability of key staff required to assist with system implementation. Public Health Wales established a Project Board in early 2021 and in March, the Executive Team was made aware under AOB within a BET meeting that it appeared more appropriate to extend the implementation timescale for the new system to be up to 1<sup>st</sup> October 2021. This proposal was also supported by the WRP.

In addition, Public Health Wales, through the Chief Risk Officer and the Head of Informatics, have identified a cyber-security issue which has prevented Public Health Wales providing the Datix development team with access to our staff data. This access is required to enable Datix to build the Public Health Wales system. The Head of Informatics is working with Digital Health and Care Wales (DHCW) to highlight the issue and to develop mitigating controls to enable the safe and secure access to our staff data. DHCW have indicated that this work will not be completed until mid-September and therefore the revised implementation date of 1 October cannot be met. To note, we are awaiting final confirmation of the delivery

date for the mitigating access controls from DHCW which will enable completion of a revised OFWCMS implementation timetable. It is envisaged that the implementation timetable will span up to 4 months for completion.

Public Health Wales is working closely the National OFWCMS Team to develop a revised implementation timetable for the following modules of the OFWCMS:

- Complaints
- Claims
- Feedback
- Incident Management
- Redress
- Safeguarding

The Business Executive Team shall be informed of the revised timetable and kept informed of development and implementation progress. In the meantime, Public Health Wales will continue to utilise the existing Datix system at no additional cost.

## 2. Description/Assessment

Public Health Wales has implemented a Project Board, chaired by the Executive Director, Quality, Nursing and Allied Health Professionals. The Project Board has requested that the Chief Risk Officer develop an implementation plan to include planning assumptions, where confirmed delivery actions of the OFWCMS cannot be certain. Based on those assumptions, and taking account of the issues and delays summarised in Section 1 above, a timetable for internal implementation has now been drawn up with a set of key milestones (with key dates to be added from the revised OFWCMS Team delivery plan) monitored by the Project Board. Over the past few months, the Project Board has made significant progress in preparing for receipt and implementation of OFWCMS. Some of the milestones, however, remain dependent upon the national OFWCMS team. A summary of progress against milestones is as follows:

Module	Number of milestones	On track	Dependant on national team
Incidents module	9	8	1
Complaints module	9	8	1
Claims module	8	7	1
Feedback module	9	8	1
Safeguarding module	9	8	1

In the paper presented to BET in November 2020, a threat assessment and four primary risks were documented. These threats and risks are now being managed by the Project Board and will report progress to BET. The current status of the threats and risks are as follows:

Threat identified	Update
Lack of Project Management Support within Public Health Wales	Support has now been allocated
Lack of data analysis capacity	Being addressed by Project Board
Lack of sufficient IT support with only one member of the IT department who has sufficient knowledge of Datix to manage the issues that arise	Being addressed by Project Board
Development of the new system is very Health Board centric	Ongoing discussions with the All Wales Project Team to address PHW required specifications.
Possible loss of resource from the Risk and IG team, who are supporting the implementation to the Covid19 response	Being addressed by Project Board
Staff not being available for release for training	Project Board is monitoring the resource implications of the ongoing response to plan training accordingly.
Lack of sufficient resource across the organisation to support the required 'dual running' of the old and the new systems, maintenance of the old 'read only' system and the data cleansing of the existing Datix system by 30 <sup>th</sup> September 2021	Project Board is monitoring the resource implications of the ongoing response to plan training accordingly.
Lack of sufficient Information Governance sign off at Trust / Health Board level	The required Memorandum of Understanding between Public Health Wales and Velindre University NHS Trust has now been received and is being assessed.

The threat assessment led to four primary risks and again, updates are shown below:

No	Risk	Update	Mitigation
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1	There is a risk that Public Health Wales will fail to deliver the requirements of the OFWCMS. The impact will be risk 2 below.	Revised implementation date to be agreed.	Project Board oversight and management of implementation risks and issues against target dates.  Regular liaison with national OFWCMS teams.
2	There is a risk that Public Health Wales will find itself without a system for management of Putting Things Right issues, including complaints, claims and incidents. The impact will be risk 4 below.	This risk is still valid	As above for risk 1.  Ongoing retention of the existing Datix system.
3	There is a risk that Public Health Wales will be required to adopt a system for management of Putting Things Right issues that will not be fit for purpose. The impact will be risk 4.	This risk is still valid	Project Board oversight and management of PHW-specific system requirements.  Working with the national OFWCMS team to ensure PHW specifications are delivered.
4*	There is a risk that Public Health Wales will be unable to effectively manage Putting Things Right issues, including claims, incidents and complaints. This will be caused by the requirement to implement the Once for Wales Concerns Management System, which is acknowledged by the project lead as likely to be not fit for	This risk is still valid	As above.  PHW has senior management representation at the OFWCMS National Programme Board which monitors module delivery and implementation. It provides a forum to raise issues and concerns over

	<p>purpose. The impact will be poor management of concerns which will have a potential impact on service user / staff safety, legislative and regulatory compliance, inability to report assurances to the Board and increased claims against the organisation.</p>		<p>specification and delivery.</p>
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Risk no 4 above is now subject to an entry on the Corporate Risk Register and the risk is flagged as Tolerate. It should be noted however that this decision is not based on the organisation's appetite for risk, but is based on the fact that the design, development and delivery of the system is mainly within the remit of the OFWCMS Programme Board and Public Health Wales has very limited influence over the final product.

#### 4. Well-being of Future Generations (Wales) Act 2015



Public Health Wales requires a solution to this issue for the long term management of PTR issues.



An effective solution to management of PTR issues enables Public Health Wales to record incidents and complaints, identify learning and plot trends, thereby helping to prevent harm to service users through repeated incidents.



An effective PTR management system needs to integrate fully with the organisation's risk management system.



The recommendations in this report will require collaboration with Welsh Government



All parts of the organisation are involved in the running of the system for managing PTR

**The Quality, Safety and Improvement Committee is asked to:**

- **Take Assurance** that PHW has implemented effective project management and control over the implementation of the Once for Wales Concerns Management System (Datix).
- **Note** that PHW is awaiting confirmation from DHCW of the delivery date of the cyber security controls prior to completing the rescheduled OFWCMS implementation plan.