

Digital transformation

Health Education and Improvement Wales

June 2026



About us

We have prepared and published this under section 61(3) (b) of the Public Audit Wales Act 2004.

© Auditor General for Wales 2026

You may re-use this publication (not including logos except as an integral part of the document) free of charge in any format or medium.

If you re-use it, your re-use must be accurate and must not be in a misleading context. The material must be acknowledged as Auditor General for Wales copyright, and you must give the title of this publication. Where we have identified any third-party copyright material you will need to obtain permission from the copyright holders concerned before re-use.

If you need any help with this document

If you would like more information, or you need any of our publications in an alternative format or language, please:

- call us on 029 2032 0500
- email us at info@audit.wales

You can use English or Welsh when you get in touch with us – we will respond to you in the language you use.

Corresponding in Welsh will not lead to a delay.

Mae'r ddogfen hon hefyd ar gael yn Gymraeg.

Audit Wales follows the international performance audit standards issued by the International Organisation of Supreme Audit Institutions (INTOSAI).

Contents

Audit snapshot	4
Key facts and figures	6
Our findings	7
Recommendations	20
Appendices	21
1 About our work	22
2 Management response form	24
3 Key terms in this report	35

Audit snapshot

What we looked at

- 1 We looked at how Health Education and Improvement Wales's (HEIW) approach to digital transformation is supporting service improvement. This included its approach to digital strategy, leadership, and skills development. We also considered how the organisation manages risks around digital infrastructure, cyber resilience, and Artificial Intelligence (AI).

Why this is important

- 2 Digital technology is a key enabler to many of the aims of A Healthier Wales. That plan says that new technologies and digital approaches will be an important part of the future whole system approach to health and care.
- 3 However, achieving digital transformation is challenging. It requires investment, the right infrastructure, and staff engagement and training. Systems need to communicate with one another and organisations must manage ever-growing risks around cyber resilience.
- 4 Digital transformation isn't just about technology, it's about culture and leadership. The boards of NHS bodies have a key role in approving and owning the organisation's digital strategy. Boards also need assurance that digital transformation is being managed safely and effectively, and that investment is securing the intended benefits.

What we have found

- 5 We found that HEIW has clearly defined digital ambition and strong Board ownership and oversight of its Digital and Data Strategy. HEIW has invested in strengthening its leadership and governance. It is actively using digital tools to improve data quality and workforce intelligence. HEIW understands its digital maturity and core digital risks. However, it has not yet fully developed quantified digital benefits or clear assurance over emerging risks such as Artificial Intelligence (AI).
- 6 HEIW has made good progress in delivering its digital ambition. However, progress may be constrained if risks around long-term resource certainty and digital capacity, are not addressed. One of HEIW's additional challenges is its dependency on its partners to deliver aspects of its digital ambitions. Take up of HEIW's national Digital Capability Framework tool by health bodies is very limited, with around a 2% use rate. HEIW is taking steps improve this, but these actions are still at an early stage and will only be effective if supported by its partners.
- 7 HEIW has experienced delivery delays in its primary digital infrastructure refresh programme, Codi. These delays in implementation have resulted in missed deadlines, additional costs and wider reputational impact with partners. HEIW has identified Codi as a corporate risk and has appropriately taken action to ensure that it is learning the lessons from this delayed programme and embedding these lessons into its other digital initiatives.

What we recommend

- 8 We have made four recommendations to the HEIW which focus on:
 - Improving engagement and impact of the Digital Capability Framework;
 - Developing a clear AI strategy and governance arrangements;
 - Establishing improved assurance over digital exclusion; and
 - Embedding the lessons learned from key digital programmes

Key facts and figures

40% of HEIW staff, have completed the 'HEIW interactive self-evaluation tool' as part of the Digital Capability Framework. Across all NHS bodies, Digital Capability Framework completion rates are very low with a total of 2,168 staff completing the framework out of a total workforce of over 100,000.

From 2022-23 to 2024-25, the HEIW invested approximately £15.6 million in digital revenue and £3.5 million in capital.

Cyber security remains a high corporate risk, reflecting the number of cyber security incidents.

HEIW has undertaken several assessments to assess aspects of its digital maturity. These identified that HEIW has low levels of maturity which it plans to address through delivering its Digital and Data Strategy.

A recent internal Audit Report on HEIW's IT Arrangements gave a positive substantial assurance rating in areas such as digital governance.

Our findings

Strategy, planning and leadership

The Board has a clear digital strategy and demonstrates strong leadership, oversight and ownership for its digital transformation plans

Digital strategy and plans

- 9 HEIW has set a clear ambition for digital transformation. It is set out in its Board-approved Digital and Data Strategy. The strategy explains the vision, priorities, and five digital missions. These missions reflect the strategic importance given to how digital transformation will support HEIW's strategic role as a national education and workforce body, not a patient service provider. Digital is described as a key enabler of organisational effectiveness, workforce intelligence, and workforce system leadership.
- 10 HEIW's digital strategy is based on a good understanding of its digital maturity. It used an internal self-assessment and an independent external assessment to identify gaps in data, analytics, and infrastructure. These assessments also supported the development of a phased 'Road Map' with agreed delivery stages and delivery milestones. Senior leaders understand where capability needs to improve and how this links to wider priorities.
- 11 HEIW has built its digital ambitions into key planning documents, including the Integrated Medium-Term Plan (IMTP) and Workforce Plans and Education and Training Plan. It sees digital as a key enabler for delivering its strategic priorities. These links provide a strong foundation. It also helps ensure that digital work supports HEIW's service and workforce needs. The Strategy aligns to national priorities, including the Welsh Government's digital agenda, A Healthier Wales, and the NHS Wales Digital and Data Strategy.

Board ownership of digital transformation

- 12 The Board shows strong ownership and commitment to digital transformation. HEIW developed the Digital and Data Strategy through structured engagement with stakeholders and staff and Board development sessions. The Board then approved it after active discussion, challenge, and refinement. This process has helped make digital transformation a shared Board responsibility, not just an Executive Team issue.
- 13 HEIW has clear senior leadership for digital transformation. The Board has an Independent Member (IM) Digital Lead, providing strong scrutiny and support. The Board has also held development sessions on data, cyber security, and Artificial Intelligence. These sessions help members make informed decisions and this understanding has improved oversight and scrutiny. The Director of Digital and Engagement is a Board member and provides technical expertise.
- 14 The HEIW also continues to take part in the All Wales Directors of Digital and IM Digital Network meetings. This allows organisations to share learning, good practice, and take part in national digital discussions that support the Health Board's digital transformation.

Roles, responsibilities, and accountability

- 15 HEIW has put in place a comprehensive governance framework for digital transformation. It sets out clear roles and responsibilities at Board, executive, and operational levels. Dedicated leaders and specialist groups support digital, data, cyber security, and information governance. This reflects the size and complexity of the digital agenda.
- 16 Digital is a regular topic in Board discussions. The Board receives updates through performance reports, Digital Strategy reports, and papers on major digital programmes. Members can see both progress and problems, including delays and risks. They also provide constructive challenge and do not rely on reported assurance alone.

- 17 The Board has historically relied mainly on narrative updates to gain assurance on digital progress. HEIW uses some measured indicators of progress and benefits, but reporting is still developing. Recent Board reports are clearer, including visual digital roadmap milestone updates. HEIW also plans to define digital benefits more clearly. Once in place, this should help the Board track delivery and impact over time.
- 18 While HEIW has put in place a comprehensive governance framework for digital, arrangements are still developing. HEIW's Board and several other groups provide oversight and assurance. These include executive and digital leadership groups, prioritisation forums, and committees that cover risk, information governance, and cyber security. Together, they bring operational, strategic, and risk views into decisions. HEIW is reviewing its operating model. As part of this, it intends to test whether its current oversight and governance, including those for digital remain fit for purpose.

Identifying and managing risks

HEIW manages its digital and cyber risks well, however there have been delays in relacing aspects of its legacy infrastructure and its approach to AI is still developing.

Strategic digital risks

- 19 HEIW recognises digital transformation as a significant strategic risk. It records specific digital risks in the Board Assurance Framework and the Corporate Risk Register. The Board has clear sight of risks linked to the sustainability of digital services and delivery of the Digital and Data Strategy. These risks are reviewed regularly through Board and committee reporting. This reinforces that digital is a core organisational issue, not just a technical one.

- 20 HEIW has a dynamic approach to managing its digital risks, which supports innovation. This reflects HEIW's role as a system leader in education and workforce transformation. This dynamic approach allows HEIW to test and adopt new digital approaches and respond to risks and challenges quickly. However, the Board still has strong governance and oversight to manage these risks.

Digital infrastructure risks

- 21 Making sure its infrastructure is fit for purpose is the first mission in HEIW's Digital Strategy. The Digital Roadmap supports this and sets out clear objectives and milestones for each of its three stages. It also makes clear that modern infrastructure is the foundation for all other digital ambitions.
- 22 HEIW understands the risks from ageing infrastructure and legacy systems. It records these risks in the digital risk register and reports them regularly to the Digital Leadership Group. This helps ensure that issues are identified and escalated. HEIW has assessed its legacy infrastructure and applications and has planned refresh and replacement work, which includes the Codi project. However, delays to programmes such as Codi whilst reported, have increased costs and extended reliance on older systems.

Cyber resilience

- 23 HEIW treats cyber security as a significant risk. Strengthening cyber security is a key mission in HEIW's Digital Strategy. This focus is supported by clear leadership, a Cyber Incident Response Plan, and structured governance and reporting. However, HEIW's residual corporate cyber risk score is lower than many other health bodies as it considers the steps it is taking to manage its cyber risks are effective. However, the cyber threat landscape changes quickly, so HEIW will need to continue reviewing its cyber oversight and governance regularly.

- 24 Cyber security is built into annual information governance plans. Updates are reported to the Senior Information Responsible Officer (SIRO), the Information Governance and Information Management Group (IGIMG), the Executive Team, and the Audit and Assurance Committee. HEIW also makes good use of independent assurance on cyber security. It is systematically working through actions from Cyber Resilience Unit assessments. A recent Internal Audit report on IT arrangements provided substantial assurance. Overall, these arrangements suggest that key controls are in place and operating effectively.
- 25 HEIW is taking steps to embed a culture of cyber security awareness across the organisation. This includes a new cyber security hub for staff and stronger cyber and information governance training. HEIW recognises that it still needs to build staff knowledge further. However, these actions show a clear commitment to managing cyber risks.

Artificial intelligence

- 26 HEIW recognises Artificial Intelligence (AI) as both a strategic opportunity and an emerging risk. Through its IMTP, HEIW has prioritised the development of an Education Framework for AI. It has also completed an AI Education Landscape Review for NHS Wales. The review assessed current capability needs and set out key recommendations. HEIW has appointed an AI Clinical Lead. This role will help HEIW respond to the growing use of AI in the workforce. These actions show that HEIW is taking its leadership role in AI education and workforce development seriously.
- 27 HEIW has recently added AI risks to its directorate risk registers. This clearer approach should improve visibility and support assurance. There are examples of where AI is being used within HEIW. Examples include administrative tasks and in the development of Business intelligence. However, AI governance arrangements, ethical oversight, and clarity on resource needs are still developing. Until these arrangements are fully in place, HEIW cannot provide comprehensive assurance on its AI risks.

Digital skills

HEIW's strategic priority to develop digital skills in the NHS workforce is undermined by low engagement with its Digital Capability Framework

Assessing digital skills

- 28 HEIW has a clear strategic priority to develop digital skills across the NHS workforce. Its Digital and Data Strategy includes a mission to build a digitally ready and skilled workforce. The Board has also identified improving the digital capabilities of HEIW's own staff as a priority. This shows that the Board sees the importance of digital skills. It also shows that more work is needed.
- 29 Engagement with the national Digital Capability Framework is low¹. Only 2% of NHS staff across Wales have completed the digital capability assessment. HEIW uses the framework as its main national approach for assessing digital capability. The framework provides a consistent way to assess an individual's digital skills. The results are intended to inform local and national workforce planning. However, we understand some health boards have suggested low completion is partly due to staff questioning its usefulness. The result of this means that HEIW and its partners cannot identify digital skills gaps with confidence. This limits their ability to target support and training.
- 30 Engagement with the Digital Capability Framework among HEIW staff is also relatively low. This is a concern given HEIW's role in developing and promoting the framework across NHS Wales. Current figures show that 242 staff have completed the assessment out of a possible 570. Engagement varies across directorates. Completion is higher in areas such as Digital and Data, but much lower in others, including medicine. Low staff engagement risks undermining confidence in the framework among other NHS bodies.

¹ The Digital Capability Framework was originally developed to assess staff digital maturity across NHS Wales.

- 31 It is not yet clear whether HEIW's current actions will address the main causes of low engagement with the Digital Capability Framework. HEIW has set up an all-Wales Digital Capabilities Development Group to understand why engagement is low. It also plans to improve the framework so it points users to a clearer set of tools to build digital skills. HEIW will support this with additional guidance to explain how to use the framework. These steps are positive, but they are still at an early stage.

Developing digital skills and capacity

- 32 HEIW's work to support NHS digital skills is still at an early stage. It has expanded the Digital Capability Framework with a growing set of national learning tools. These include the rollout of the Y Ty Dysgu learning management system and training in digital and data literacy. HEIW is also testing new approaches, such as virtual-reality pilots and AI-enabled learning tools. This programme shows ambition and creativity and reflects HEIW's role as a system leader. However, it is not yet delivering full impact.
- 33 HEIW also recognises the need to strengthen digital skills in its own workforce. Internal assessments found gaps in data literacy, digital project management, and the ethical use of new technologies. HEIW has started to respond through internal training, digital champions, and Board-level development sessions. This work is still developing. It will need sustained focus to support HEIW's wider digital ambitions.
- 34 Shortages in key digital roles remain an ongoing risk. HEIW recognises that capacity and capability are essential for digital transformation and has a Digital and Data Team of nearly 70 staff. However, it still faces recruitment challenges in some specialist roles. The Board is aware of these risks and HEIW is taking steps to reduce their impact. This includes the use, where needed, of external digital expertise. Competition for skills in cyber, AI, and data analytics makes it hard to recruit skilled staff. It also creates a risk of higher turnover which could affect the retention of digital expertise and corporate knowledge. If not addressed this could affect delivery of HEIW's digital plans.

Collaboration and involvement

HEIW engagement with partners and stakeholders is well developed and is used to inform key digital developments. However, its approach to digital exclusion is still developing.

Reducing digital exclusion

- 35 HEIW recognises the importance of reducing digital exclusion. This is mainly relevant to workforce education and training, and access to digital learning platforms. HEIW's approach focuses on staff, trainees, and partner organisations and reflects HEIW's non-patient-facing remit. Ensuring that all current and future students are digitally included is important as more of the training commissioned by HEIW is delivered digitally. Digital exclusion is also a key feature of national frameworks and education platforms, such as the Digital Capability Framework and Y Ty Dysgu. These platforms include digital inclusion requirements in their design.
- 36 HEIW is taking steps to reduce digital exclusion through its education commissioning. It increasingly expects Higher Education Institutions to build digital capability into the health professional training that it commissions. This should provide a baseline level of digital skills for new NHS staff. HEIW also applies equality impact assessments to major digital programmes. This helps to ensure its digital systems meet national equality and accessibility standards.
- 37 HEIW faces challenges in demonstrating that its approach to digital exclusion is fully effective. Low engagement with the Digital Capability Framework reduces confidence that skills gaps and exclusion risks are being identified. Variable digital and data maturity among users of HEIW's data platforms may also weaken assurance.

- 38 HEIW does not yet routinely evaluate whether the confidence of users of its information and systems improves over time. It also does not routinely test whether some groups still face barriers. HEIW recognises these gaps and is taking steps to improve, however, this remains in development.

Staff and service user involvement

- 39 HEIW has effective and structured ways to involve staff and stakeholders. These mechanisms are a key part of the design and development of digital systems. They include stakeholder reference groups, professional engagement during framework development, and regular feedback cycles within major programmes, such as learning platforms and workforce systems.
- 40 Collaboration and engagement help HEIW deliver its strategic workforce responsibilities for NHS Wales. HEIW works with national and regional partners, including health boards, professional bodies, Welsh Government, Digital Health and Care Wales, and academic institutions. This collaboration is built into governance groups, national programmes, and co-produced workforce plans. It supports alignment and shared ownership of digital ambitions.
- 41 Engagement activity is generally well designed and proportionate. There is clear evidence that feedback has led to system improvements and better content. However, HEIW relies on voluntary participation from stakeholders and partners. Digital maturity also varies, and responsibilities are not always clear between national and organisational workforce roles. These factors constrain engagement and create risks. To manage them, HEIW plans to strengthen engagement through improved stakeholder mapping and more targeted communication as part of its future engagement strategy development.

Using digital developments to support service transformation

HEIW has routinely increased its investment in digital. However, future funding constraints may limit the pace of its digital transformation.

Investment in digital transformation

- 42 HEIW has prioritised investment in digital to support organisational effectiveness and system leadership. Digital activity is set out in the Integrated Medium-Term Plan and linked to strategic objectives. This reinforces the role of digital in workforce planning, education delivery, and data-driven decision-making. HEIW also recognises that some ambitions may exceed available resources and capacity. This is most likely where delivery needs sustained investment or national adoption.
- 43 HEIW’s digital revenue and Capital spend has increased since 2022–23 (Exhibit 1). HEIW has made significant investment in its digital programme in 2023-24 and 2024-25. This increase is mainly due to one-off, large investments in digital infrastructure, such as the Codi programme.

Exhibit 1: Annual capital and revenue investment in digital (2021–22 to 2024–25)

Financial Year	Capital (£m)	Revenue (£m)
2021-22	0.280	6.328
2022-23	0.226	4.253
2023-24	1.292	5.389
2024-25	2.014	5.949

Source: HEIW

Exhibit 2: Planned annual capital and revenue investment in digital (2025–26 to 2028–29)

Financial Year	Capital (£m)	Revenue (£m)
2025-26	1.389	5.478
2026-27	0.617	5.478
2027-28	0.641	5.478
2028-29	0.650	5.478

Source: HEIW

Note: Capital estimates for years 2026-2029 do not include software development cost which at the time of the review were unknown.

44 Exhibit 2 shows that the revenue forecast for future years assumes flat funding. This investment profile means that in real terms (i.e. accounting for inflation) would, in effect, be a reduction digital funding over this period. This may mean that HEIW's digital ambitions will take longer to deliver than planned or that certain aspects will not get delivered. The Capital forecast from 2026 onwards is more in line with the typical level of capital investment HEIW would expect to make in its digital programme. Historically, HEIW has been successful in securing one-off capital funding from Welsh Government for digital projects. We understand that HEIW plans to continue this approach to support future initiatives in its Digital and Data Strategy.

45 HEIW has a structured prioritisation process to manage demand for digital investment. The Planning and Prioritisation Group runs this process each month. It uses a tailored Reach, Impact, Confidence, Effort (RICE) model to score project requests. The scoring considers strategic alignment with the Welsh Government remit letter and corporate priorities in the IMTP. It also considers available capacity and the expected value of the initiative. This approach helps HEIW prioritise digital projects within its funding limits.

Local and regional digital projects

- 46 HEIW is delivering a range of internal digital programmes to modernise core systems and improve workforce processes. Major platforms, including learning management and workforce administration systems such as Y Ty Dysgu and Codi, are replacing fragmented legacy arrangements. This should improve efficiency, consistency, and user experience. The programmes align with strategic priorities and are subject to appropriate governance and scrutiny.
- 47 Delivery challenges in one of HEIW's key digital investments, Codi, have led to a significant increase in programme costs. Welsh Government has provided funding to cover these additional costs of over £900,000. However, the implementation delays of nearly ten months are likely to have reduced confidence in the programme's benefits. Until Codi is fully embedded and stable, HEIW will continue to rely on the ongoing use of the legacy 'intrepid' system and other workarounds. These delays have limited the pace and scale of parts of its digital transformation.
- 48 HEIW has developed a strong suite of national workforce data dashboards. These dashboards are a keyway for HEIW to deliver its strategic workforce role. In our Business Intelligence report, we noted that HEIW is using dashboards well to support workforce decision making by partners. The Digital Portal, and work with Digital Health and Care Wales to improve data quality, should help make the dashboards easier to access and more accurate.

Adopting national digital systems

- 49 HEIW supports and adopts national digital solutions and ensures its work around data quality aligns with the National Data Resource platform. It works closely with key partners across NHS Wales. HEIW aligns with national standards and contributes to "Once for Wales" approaches, especially for data, analytics, and workforce systems. Strong engagement with Digital Health and Care Wales, Welsh Government, and other national bodies supports this work.

- 50 HEIW has developed and delivered a range of successful local digital projects. A good example of this is HEIW's suite of national dashboards on its Data and Analytics Portal, which are used by NHS organisations across Wales.
- 51 HEIW is working with partners to improve the quality of workforce data. HEIW's data and analytics team is improving data quality so it is consistent and meets national standards. Over time, this should improve HEIW's dashboards. It should also support better workforce decisions across partner organisations.

Evaluating digital solutions

- 52 HEIW recognises the importance of knowing whether its digital work has delivered the intended benefits. It has structured planning, prioritisation, and governance for digital initiatives. Recent improvements in digital reporting have improved visibility of progress. In our [Business Intelligence](#) report, we noted that HEIW's approach to learning lessons from digital activity was still developing and recommended action. We understand that HEIW has taken steps in response and is embedding lessons learned from programmes such as Codi.

Recommendations

54 The following table details the recommendations arising from our work.

Recommendations

- | | |
|----|--|
| R1 | <p>HEIW should continue to work with partners on its Digital Capabilities Framework (DCF) to:</p> <ul style="list-style-type: none">R1a identify why engagement with the DCF is low;R1b design improvements that will significantly increase participation and improve the digital skills of NHS workers; andR1c routinely provide assurance to the Board on both the numbers of those completing the DCF and the impact and improvement that it is achieving over time. |
| R2 | <p>HEIW should strengthen and embed its AI governance and assurance framework to ensure it can effectively manage AI-related risks.</p> |
| R3 | <p>HEIW should routinely provide assurance to the Board the extent to which any of its stakeholders face barriers accessing its systems, information and digital training.</p> |
| R4 | <p>HEIW should ensure that the lessons learned from evaluating digital investments such as Codi are embedded within its wider digital programme.</p> |

Appendices

1 About our work

Scope of the audit

The goal of this audit is to find out if the HEIW is using digital technology to support service modernisation and efficiency. This included the approach to strategy, leadership, and skills development for digital transformation, and how risks around digital infrastructure, cyber resilience and artificial intelligence are being managed.

Audit questions and criteria

Questions

Our audit addressed the following questions:

- Does the HEIW have a well-led and appropriately resourced approach to digital transformation?
- Is the HEIW developing the digital skills, capacity, and capability of its workforce?
- Does the HEIW have a clear plan for managing its cyber resilience arrangements and digital infrastructure and how they will need to change to support its digital transformation ambitions?
- Does the HEIW engage effectively with staff, partners, patients / service users to deliver its digital transformation ambitions and minimise digital exclusion risks?
- Is the HEIW actively utilising new digital technology and data solutions to enhance the accessibility, quality, efficiency, and productivity of its services?

Criteria

Our audit questions were shaped by:

- External reference input from the Welsh Government, all-Wales NHS Directors of Digital, and Digital Health & Care Wales.

- Relevant Welsh Government strategies and plans.
- Relevant NHS Digital Transformation review reports completed by the National Audit Office and House of Commons Health and Social Care Committee.
- NHS England Department of Health & Social Care: A plan for digital health and social care policy paper.
- NHS England Transformation Directorate: What good looks like framework.

Methods

We asked Health Education and Improvement Wales (HEIW) to:

- Complete a self-assessment to help us understand how the organisation is undertaking digital transformation.
- Give us facts and figures about its spending on digital technology, staff digital skills, cyber resilience, and how it involves people in digital transformation.

We reviewed a range of documents, including:

- Board and committee papers and minutes.
- Key strategies and plans, including the Digital Strategy and IMTP.
- Key risk management documents, including the Board Assurance Framework.
- Relevant policies and procedures.
- Reports prepared by other relevant external bodies.

We interviewed the following key stakeholders:

- Chief Executive
- Director of Digital, Data and Engagement
- Deputy Chief Exec & Director of Finance Planning and Performance
- Board Secretary and SIRO
- Independent Member - Digital Lead
- Performance Manager

We observed Board meetings.

2 Management response form

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R1	HEIW should continue to work with partners on its Digital Capabilities Framework (DCF) to:	HEIW has already taken substantive action to respond to this recommendation. The DCF was not designed or implemented as a compulsory assessment; it has provided a voluntary national baseline of digital confidence and capability across NHS Wales, with more than 2,500 submissions now available to inform priorities, target learning and support workforce planning. This baseline is now being used to shape a more targeted delivery approach, including digital learning provision aligned to DCF domains and practical application of the emerging Graduated Capability Model. The next phase takes the learning from that baseline and evolves the work from a digital skills assessment tool into a broader workforce transformation approach. This includes applying the refreshed DCF and emerging Graduated Capability Model in	March 2027	Director of Digital Data and Engagement / Chief Information Officer

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		practice to help define the digital and data capability required for roles, services and new ways of working, and to support delivery of digitally enabled transformation. The work will be delivered through the Digitally Enabled Workforce Transformation Programme and the 2026/27 IMTP. Progress will be scrutinised through the programme's agreed governance arrangements and reported through Digital and Data Strategy and corporate performance reporting, with formal assurance provided to the Board through the relevant Board committee.		
R1a	Identify why engagement with the DCF is low:	HEIW will consolidate and analyse the available registration, participation and completion data, existing DCF evaluation responses and feedback from NHS Wales organisations, workforce groups and users to	31 March 2027	Director of Digital Data and Engagement / Chief Information Officer

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		validate and address the barriers indicated by the evidence. The analysis will consider awareness, access, time, usability, relevance to role, organisational support, accessibility, Welsh-language provision and whether participants are able to act on their identified development needs. The findings and resulting actions will be documented within a prioritised improvement plan, with owners, timescales and measures of progress. The learning is now being used to redesign the approach so that digital and data capability is linked more directly to role, responsibility, career stage, service need, learning pathways and organisational workforce planning. The planned action is therefore focused on improving relevance, application and impact, while also establishing proportionate measures for improving participation, workforce coverage		

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		and completion. The resulting actions will be documented and reviewed through the programme's agreed governance arrangements, with progress monitored through the implementation roadmap and used to inform future delivery and evaluation.		
R1b	Design improvements that will significantly increase participation and impact: and	HEIW will develop and test a clearer, more practical delivery model designed to increase participation and demonstrate impact, using the DCF alongside the developing Graduated Capability Model. This includes testing a role-based approach that assesses current and future digital requirements, maps them against the relevant DCF domains and developing graduated capability expectations, supports targeted development, and measures change over time. Initial testing will take place	31 March 2027	Director of Digital Data and Engagement / Chief Information Officer

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		through selected national service demonstrators in mental health, community services and primary care, alongside internal HEIW testing. This will assess how the approach can support workforce development, digitally enabled models of care, the safe use of data and AI, and future role and service design before wider national implementation. Each demonstrator will generate a documented capability profile, role or service mapping, identified development priorities and implementation learning. This will allow HEIW to test not only whether people participate, but whether the approach is relevant to their role, supports access to appropriate development and can inform workforce and service planning. Measures will include participation and completion, representation across relevant		

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		workforce groups, user feedback, learning accessed following assessment, changes in confidence or capability where repeat measurement is appropriate, and evidence that findings have informed workforce development or service planning. The demonstrators will also identify the organisational conditions, barriers and support required for successful wider implementation. Baseline measures and proportionate improvement targets will be agreed using the findings from the engagement analysis.		
R1c	Routinely provide assurance to the Board on both the numbers of those completing the DCF and the impact that it is having over time.	HEIW will strengthen Board assurance by establishing a clearer reporting framework for the DCF and wider digitally enabled workforce transformation programme through IMTP and performance reporting. The	31 March 2027	Director of Digital Data and Engagement / Chief Information Officer

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		framework will set out the measures, data limitations, reporting frequency, responsible owners and escalation routes. Reporting will cover participation, completion, workforce coverage, capability themes, learning uptake, demonstrator progress, barriers and available evidence of impact. It will distinguish between activity, outputs and impact, enabling the Board to assess both progress and confidence in the evidence. Progress will be monitored through programme governance, the implementation roadmap and 2026/27 IMTP deliverables. This will provide a clear line of sight from the voluntary DCF baseline to targeted workforce development and measurable changes in capability, confidence and application, with aggregated insight shared with NHS Wales organisations where appropriate.		

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R2	HEIW should strengthen and embed its AI governance and assurance framework to ensure it can effectively manage AI-related risks.	HEIW will strengthen AI governance and assurance to manage AI-related risks across internal use and national AI-enabled services. An AI Policy will be developed and implemented as part of HEIW's wider AI governance and assurance arrangements. This will align with the AI Mentor Governance Framework, emerging Agentic AI guidance and any relevant national or organisational requirements, ensuring that AI-related risks are identified, assessed, managed and escalated through appropriate governance arrangements and groups, including the Digital, Data and Engagement Senior Leadership Team (DSLTL). Appropriate assurance and reporting measures will also be developed and monitored through these arrangements to provide oversight of implementation, compliance and emerging AI-related risks.	31 March 2027	Director of Digital Data and Engagement / Chief Information Officer

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R3	HEIW should routinely provide assurance to the Board on the extent to which any of its stakeholders face barriers accessing its systems, information and digital training.	HEIW will provide assurance on stakeholder access barriers through a more structured and reporting approach. Reporting will align with the new operating model arrangements from November 26 onwards. This will draw together existing insight from service desk trends (once new service desk is implemented), user feedback, engagement activity, equality and accessibility considerations, digital learning participation data, system usage information and issues raised through programme and service governance. Findings will be reported through existing Digital and Data Strategy annual report and performance reporting routes, with themes escalated where they affect delivery, inclusion, user experience or the effectiveness of digital transformation.	31 March 2027	Director of Digital Data and Engagement / Chief Information Officer

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R4	HEIW should ensure that the lessons learned from evaluating digital investments such as Codi are embedded within its wider digital programme.	Lessons learned from Codi WP1 have already been completed through the independent technical assurance review, the WP1 lessons learned exercise, readiness review and post go-live stabilisation activity. These findings have been considered through programme governance and translated into a continuous improvement plan covering governance, delivery planning, scope control, testing, business readiness, stakeholder engagement, data migration, service monitoring and technical assurance. The learning has also directly influenced the next stage of the Codi business case for MARS and Orbit 360. The case is now structured around a clearer separation of Discovery, Alpha and Build activity, more realistic MVP definition, evidence-based readiness criteria, strengthened user acceptance testing, capacity-based planning	31 March 2027	Director of Digital Data and Engagement/ Chief Technology Officer

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		and decision gates for scope, cost, delivery and benefits validation. It also places greater emphasis on benefits and impact, including user experience, reduced manual workarounds, improved data quality and reporting, operational efficiency, cyber resilience, sustainability, protection of prior investment and the development of HEIW's internal digital delivery capability. This demonstrates that lessons are not being treated as a retrospective exercise only, but are being embedded into the wider digital programme and used to shape future investment decisions, delivery controls and benefits realisation.		

3 Key terms in this report

Term	Description
Codi	Codi is a new integrated digital system designed to streamline and enhance the management of Resident Doctors and Postgraduate Professionals across NHS Wales and means “Rise” in Welsh. Long term, Codi will incorporate the online data-driven systems provided by HEIW into a single access point
Corporate Risk Register	A Corporate Risk Register sets out the organisation’s significant risks (either those with high scores or organisation-wide impact) and the actions in place to manage them.
Cyber Hub	The Cyber Hub is an internal SharePoint site for HEIW staff which contains useful resources to support better understanding of Cyber security risks and practice.
Digital and Data strategy – 5 Missions	HEIW’s Digital and Data Strategy has five key areas of focus call “missions”.
Digital Inclusion Charter	The Digital Inclusion Charter for Wales is a national set of commitments that organisations sign up to in order to actively support and promote digital inclusion across Wales.

Term	Description
Electronic Prescribing and medicines administration (ePMA)	A system in its hospitals, designed to improve patient safety through better documentation, streamlined workflows, and more efficient access to medication records as part of NHS Wales' Digital Medicines Programme
EMRMA	Electronic Management Records Maturity Assessment – provides an assessment of where Health Bodies stand on full use of your patient health records
HEIW's Digital Capability Framework	A national model outlining the digital skills, behaviours and confidence health and care staff need, organised into six capability domains with a self-assessment tool for development
HIMMS	Healthcare Information and Management Systems Society – a global, non-profit organisation dedicated to improving health quality, safety, and cost-effectiveness through the best use of information technology and management systems.
INFRAM	Infrastructure maturity and adoption Model, designed to assess requirements for safe and effective care deliver
Integrated Medium Term Plan	An Integrated Medium-Term Plan is a three-year plan that sets out how the organisation will deliver its services, manage its workforce, and meet its financial duties to break even. The organisation submits its plan to the Welsh Government for approval.

Term	Description
My Medical Record	System allows patients access to results quickly, as well as access to records and clinic appointments
National Data Resource (NDR) platform	NDR is Wales' national health and social care data platform, led by Digital Health and Care Wales (DHCW). It is designed to join up, standardise, and modernise how data is collected, stored, accessed and analysed across NHS Wales and its partners.
Once For Wales	National approach in NHS Wales where a digital system, process or standard is designed, procured and implemented once at a national level, rather than each Health Board creating its own version.
OpenEyes	Electronic patient record (EPR) system designed specifically for ophthalmology services.
Planned Care Programme	The NHS Wales programme focused on reducing long waits, improving outpatient and theatre efficiency, and ensuring timely treatment—especially for cancer and the longest-waiting patients—through pathway optimisation, day-case expansion, and improved scheduling
Shadow IT	Shadow IT refers to any software, hardware, or technology service used within an organisation without the knowledge, approval, or oversight of the IT department

Term	Description
Six Goals Programme	A national NHS Wales transformation framework for urgent and emergency care, structured around six goals covering admission avoidance (Goal 1), front-door assessment and flow (Goals 2–4), and effective discharge and recovery (Goals 5–6)
Strategic Risk Register	The Strategic Risk Register sets out the risks linked to the organisation’s strategic objectives, and the controls and assurances in place to manage those risks.
Y Ty Dysgu	HEIW’s national education portal / learning management system, launched in 2022. It is a single, unified platform that integrates learning modules, events and CPD resources.

About us

The Auditor General for Wales is independent of the Welsh Government and the Senedd. The Auditor General's role is to examine and report on the accounts of the Welsh Government, the NHS in Wales and other related public bodies, together with those of councils and other local government bodies. The Auditor General also reports on these organisations' use of resources and suggests ways they can improve.

The Auditor General carries out his work with the help of staff and other resources from the Wales Audit Office, which is a body set up to support, advise and monitor the Auditor General's work.

Audit Wales is the umbrella term used for both the Auditor General for Wales and the Wales Audit Office. These are separate legal entities with the distinct roles outlined above. Audit Wales itself is not a legal entity.



Audit Wales

Tel: 029 2032 0500

Fax: 029 2032 0600

Textphone: 029 2032 0660

E-mail: info@audit.wales

Website: www.audit.wales

We welcome correspondence and
telephone calls in Welsh and English.

Rydym yn croesawu gohebiaeth a
galwadau ffôn yn Gymraeg a Saesneg.