

Digital Transformation

Public Health Wales NHS Trust

July 2026



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Audit snapshot

What we looked at

- 1 We looked at how Public Health Wales NHS Trust's (the Trust) approach to digital transformation in supporting service improvement. This included the approach to 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 is not just about technology; it is 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 The Trust has clear digital aims, supported by good leadership and governance. However, the Digital and Data Strategy and route map lack milestones, detail on resources, and accountability information. Progress reporting is often high level. This makes it hard to track progress and spot delays.
- 6 The Board has reasonable visibility of strategic digital risks. The Trust is taking steps to strengthen infrastructure and cyber security arrangements, although cyber security remains a high risk. The Trust's use of AI is at an early stage and its assurance on this area is still developing. As a result, committee reports focus on risks rather than how AI is used in practice.
- 7 The Trust is investing in specialist digital skills and has strengthened its central digital teams. But it does not yet have a consistent view of digital skills across the Trust. Skills development across the Trust is also uneven. This limits workforce planning and may slow digital change.
- 8 The Trust is delivering a range of local, regional, and national digital projects. Service users are involved in developing digital projects. It has adopted the Digital Service Standards for Wales and remains committed to digital inclusion, but it needs to better set out its approach to guide work in this area.
- 9 The Trust uses digital to support services, but assurance is weakened by funding uncertainty, capacity pressures, and reliance on national programmes. Inconsistent evaluation makes it hard to show how digital work improves services and ways of working.

What we recommend

- 10 We have made seven recommendations to the Trust. They focus on:
 - strengthening the Digital and Data Strategy with clearer milestones, and delivery accountability;

- improving Board and committee reporting to better link progress to strategic aims;
- building digital workforce capability through consistent skills assessment and development;
- strengthening digital inclusion planning and reporting;
- aligning medium-term digital investment with strategic priorities;
- strengthening oversight of national digital programmes and partnerships; and
- introducing a consistent approach to evaluating digital solutions.

Key facts and figures

An Internal Audit review of the Trust's Digital and Data Strategy in December 2024 gave 'reasonable assurance'.

Of the Trust's workforce of approximately 2,500 staff, only 17 have completed the Health Education and Improvement Wales (HEIW) Digital Capability Framework self-assessment.

The September 2025 Cyber Assessment Framework review found that most areas met the standard. But the overall rating was 'not achieved' because one area did not meet the required level.

An Internal Audit review of the Trust's cyber security arrangements in April 2026 gave substantial assurance.

The Trust has not reported any incidents under the Network and Information Systems Regulations 2018 since March 2025.

Between 2021-22 and 2024-25, the Trust spent about £15.5 million in digital revenue and £5.4 million on digital capital.

Our findings

Strategy, planning and leadership

The Trust has a clear strategy, leadership, and governance for digital transformation, but current arrangements make it difficult to track progress

Digital strategy and plans

- 11 The Board approved the Trust's Digital and Data Strategy for 2023-26 in September 2023. The strategy explains how the Trust will use digital and data to support its long-term plans and improve day-to-day work. It aims to improve digital skills. It also aims to use data more effectively to improve services, analysis, and decision-making. It also highlights the use of digital and data to improve collaboration, reduce duplication, and support prevention and early action on public health risks. The strategy aligns with national priorities.
- 12 The strategy is based on the Trust's view of its digital strengths and challenges. This draws on internal reviews, staff discussions, system mapping, engagement with external stakeholders, and a range of assessments undertaken across its digital and data estate. These include the 2023 Architecture Review, programme-led assessments of technical debt, other audits and feasibility reviews, and an HIMSS INFRAM assessment completed in March 2026. The strategy sets out the Trust's starting position, including older systems, gaps in skills and capacity, data quality issues, and governance arrangements. While there is no single digital maturity assessment covering the full breadth of the Trust's public health functions, the range of reviews and assessments provides insight into digital capability and areas for improvement across the organisation.

- 13 The Trust has produced a digital route map to support delivery. It covers national and local work and lists planned work across digital, data, cyber security, automation, and AI. It does not clearly show delivery milestones or resource needs. Nor does it show how progress will be measured and monitored. This makes it hard to judge if delivery is on track.

Board ownership of digital transformation

- 14 The Board understands and supports the Digital and Data Strategy. Senior leaders also recognise the importance of digital transformation. Digital issues are discussed by relevant committees (see **paragraph 17**), and Board members have taken part in some training. This has included agile working and AI, with further training planned on cyber security and digital health. More regular training would help Board members provide more consistent leadership and challenge on digital matters.
- 15 The Trust is part of the All-Wales Directors of Digital forum. But it is not represented on the All-Wales Independent Member (IM) Digital Network. This limits opportunities to share learning, contribute to national discussions, and inform the Trust's digital change work.

Roles, responsibilities, and accountability

- 16 The Trust has strong digital leadership. The Executive Director of Research, Data and Digital leads the Digital and Data Strategy. Day-to-day work is led by the Head of Digital Services. This work is supported by digital portfolio leads and specialist leads in key areas, including cyber security, cloud systems, and data services. The Trust also has a Non-Executive Director for Digital and Data. Other Board members bring relevant experience from a range of sectors. This supports informed discussions and effective challenge.

- 17 The Board receives regular updates on the progress of the Trust's digital work through routine Digital and Data Directorate reports and Performance and Insight reports. The Executive Team and the Knowledge, Research, and Information Committee also receive quarterly updates. These include regular Digital and Data Assurance Reports and strategy updates. The updates give a high-level view of progress against the strategy and route map. They also cover major programmes, key risks, and work on AI (see **paragraph 30**). This helps the Board focus on priorities and progress rather than detailed outcomes. Non-Executive Directors provide good challenge and regularly ask questions on progress and delivery. Because the strategy is high level, it is not always clear how progress links back to its original aims.
- 18 Digital services are managed well, with clear roles and responsibilities. The Research, Data, and Digital Directorate leads digital and ICT work. The Digital and Data Design Authority oversees delivery, sets priorities, and checks that digital work meets standards. The group reports quarterly to the Executive Team and the Knowledge, Research, and Information Committee. Programme Boards oversee individual programmes and report on progress, risks, costs, and decisions. These are considered by the Executive Team or the Board, depending on the investment size.

Identifying and managing risks

The Trust is taking steps to minimise digital risks and is improving its infrastructure and cyber security, but cyber remains a high risk and it needs to strengthen assurance on AI impact and benefits

Strategic digital risks

- 19 The Trust's Strategic Risk Register includes two digital-related risks. Both risks are rated as high, with scores of 16 and 15 in that order. The risks are:
- failure to fully exploit digital and data to improve public health in Wales; and
 - loss of sensitive information, and/or disruption to services caused by cyber incidents, other external factors, weaknesses in digital resilience, silo working and lack of strategic oversight of digital and data outputs.
- 20 Overall, the Board has reasonable visibility of strategic digital risks. Reports explain the controls in place, track progress on actions, and include some indicators. Clearer reporting on the effectiveness of controls and actions would strengthen Board oversight.

Digital infrastructure risks

- 21 The Digital and Data Strategy refers to digital infrastructure, including systems, cloud services, cyber security, and older technology. While the strategy recognises the need to improve older systems, this information is not brought together in one place. The Trust has also developed a separate strategic approach to infrastructure development. This sets out plans for both digital and estates infrastructure and explains how investment will be managed.

- 22 An Internal Audit review in April 2024 on the Trust's IT infrastructure provided reasonable assurance. It found that the Trust's IT systems are mostly well managed. Data centres are secure, systems are monitored, and regular updates help reduce cyber risk. The audit though found extensive use of older equipment and weaknesses in managing risks, system alerts, and network updates.
- 23 The Trust is taking steps to better understand its digital and estates infrastructure risks. This includes reviewing systems, mapping IT infrastructure, and using risk tools to prioritise system replacement. This has led to some progress. Recent updates show that some core network switches have been replaced and firewall replacement is underway. The Trust is also investing in key systems such as Newborn Bloodspot Screening and Digital Health Protection. It is also creating specialist roles to support this work.

Cyber resilience

- 24 As noted in **paragraph 19**, cyber security is a strategic risk. The Audit and Corporate Governance Committee reviews this risk regularly and provides effective challenge. This has led to actions that reduced the risk score from 20 to 15 in February 2026. Despite this, the risk remains high.
- 25 The Trust has been reviewed several times by the Welsh Government's Cyber Resilience Unit between 2022 and 2025 using the Cyber Assessment Framework. The most recent review, in September 2025, showed good progress, with seven of the nine areas achieved and one partly achieved. But the overall rating remained 'not achieved' because one area did not meet the required standard.
- 26 The Trust meets regularly with the Cyber Resilience Unit to review progress. It has also developed a Cyber Improvement Plan to address issues, including firewall updates and replacing older systems. Progress updates were reported to the Audit and Corporate Governance Committee in January, March, and May 2025. The May report showed that some improvements had been made to cyber security and actions were in place to reduce risks.

- 27 An Internal Audit review on cyber security in April 2026 gave the Trust a substantial assurance rating. It found that risks are well managed, updates are regularly reported, and Board members and senior leaders understand the risks. It also found that the Trust is making good progress in delivering its Cyber Improvement Plan.
- 28 Cyber security updates are reported to the Audit and Corporate Governance Committee. These set out key risks, audit findings, actions underway, and next steps. They focus on overall risk and improvement work rather than day-to-day incidents. At the time of our review, no incidents had been reported to the Welsh Government under the Network and Information Systems (NIS) regulations in the past 12 months.
- 29 The Trust has a dedicated Cyber Security Team. The team works with other teams to ensure cyber security is considered early in system design and development. It also delivers training, simulated cyber-attacks, and scenario-based exercises. These help staff understand cyber risks and improve the Trust's response to cyber incidents.

Artificial intelligence

- 30 The Trust recognises the opportunities and risks associated with AI, but its use remains at an early stage. The Board has focused on putting clear governance in place, including the Artificial Intelligence Design Authority (AIDA). AIDA oversees how AI is developed and used across the Trust, sets guidance, provides assurance, and helps ensure AI is used safely, legally, and ethically.
- 31 AI issues regularly appear in the Digital and Data Assurance Reports. But these focus on ethical, legal, and data risks, rather than the wider use of AI. Some AI tools are being explored or piloted. But there is little evidence yet of clear service or productivity benefits.

Digital skills

While the Trust is investing in specialist digital skills, the lack of a consistent assessment tool limits workforce planning and may slow overall digital transformation

Assessing digital skills

- 32 The Trust recognises the importance of digital skills and has taken some steps to understand workforce capability. However, at the time of our review, it lacked a consistent approach to assessing the wider digital skills and capabilities needed to support digital transformation across the organisation. The Trust makes limited use of tools such as the HEIW Digital Capability Framework, which it considers too general for its public health work and major digital programmes. The Trust has since indicated that it intends to assess digital skills needs at the start of major digital and data programmes and review these throughout programme delivery. While this is positive, it still needs to do more to gain a clear understanding of digital capability requirements to plan workforce development, training and resource needs effectively.

Developing digital skills

- 33 The Trust is committed to developing digital skills, as set out in its refreshed People Strategy. Most learning takes place through individual programmes or areas such as cloud capability, where staff develop skills through delivery and knowledge sharing. But there is no clear, Trust-wide approach to building digital skills across the wider workforce. As a result, more work is needed to make sure staff have the skills needed to support digital transformation.

- 34 The Trust has a considerable number of staff working as data analysts, data scientists, data engineers, and data researchers. It has invested in programme-specific teams. It has also strengthened its central digital teams through specialist roles in cyber security, data, user centred design, and cloud technologies. These teams play a key role in delivering digital work, supporting services, and managing digital risks. Overall capacity remains limited though. Some specialist roles are vacant. As a result, work often depends on prioritisation and external support. The Trust also reports that it still has challenges in preparing its wider workforce for modernising service delivery. This continues to be a potential barrier to digital change.

Collaboration and involvement

The Trust recognises digital inclusion and engages some staff, but service user involvement is limited, and the absence of a clear plan limits progress in delivering inclusive digital change

Staff and service user involvement

35 The Trust involves staff and service users in the design and testing of its digital systems, The User Centred Design Team supports engagement through user research and service design, and has developed approaches such as user personas, early user research and testing activities and knowledge-sharing mechanisms to support user-centred design.

Reducing digital exclusion

36 The Trust recognises the importance of digital inclusion, as reflected in its Digital and Data Strategy. The strategy highlights fairness, access, and reducing inequalities. The Trust has considered digital inclusion in several projects. For example, it has:

- been designated as a World Health Organisation (WHO) Europe Collaborating Centre for digital health equity;
- carried out survey and research work on digital equity during the pandemic;
- tested the accessibility of its website; and
- started work to understand barriers faced by people with learning disabilities.

- 37 The Trust has also adopted the Digital Service Standards for Wales, which helps it to embed digital inclusion principles and accessibility standards across its digital transformation work. The Director of Digital has lead responsibility for digital inclusion. Despite this, the Trust needs to better set out its overall approach to digital inclusion, including its objectives, priority actions, measures of success, and how it will assess whether its activities are reducing digital exclusion in practice.
- 38 Digital and Data Assurance Reports do not routinely report on digital inclusion actions, progress or outcomes. As a result, it is difficult to assess the impact of the Trust's approach or gain assurance that digital exclusion is being addressed consistently and systematically across the organisation.

Using digital developments to support service transformation

The Trust uses digital to support services, but funding uncertainty, limited capacity, national dependencies, and inconsistent evaluation weaken assurance over delivery of digital transformation

Investment in digital transformation

- 39 The Trust's current digital funding mainly supports day-to-day digital services, staff, and a small number of priority projects. Some funding is also in place for specific projects, such as the Laboratory Information Management System (LIMS), digital systems used in screening services, parts of the website programme, and cyber security work. The Trust develops multi-year plans through its Integrated Medium Term Plan (IMTP), supported by programme business cases and governance arrangements. However, funding is typically agreed on a year-by-year or project-by-project basis. As a result, it is not clear whether funding is in place to deliver all initiatives set out in the Digital and Data Strategy. Many plans therefore remain dependent on future funding decisions and national support.
- 40 **Exhibits 1 and 2** show that the Trust's digital spending has increased in recent years. Revenue spending rose from £2.9 million in 2021-22 to £5.2 million in 2024-25. This reflects the rising ongoing costs of running digital services. Capital spending has varied from year to year since 2021-22, ranging from £0.7 million to £1.8 million. Planned capital spending is higher in the short term but drops in later years. Planned revenue spending increases slightly, year on year.

- 41 The Trust has also raised concerns about the deliverability of its 2025-28 Integrated Medium Term Plan (IMTP). This is because funding beyond the current planning period is not confirmed. As a result, it is unclear if the Trust will have enough long-term funding to replace older systems and deliver all planned digital improvements.

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

Financial year	Capital (£m)	Revenue (£m)
2021-22	1.2	2.9
2022-23	0.7	3.5
2023-24	1.8	3.9
2024-25	1.7	5.2

Source: Data supplied by the Trust

Exhibit 2: Planned levels of capital and revenue investment in digital (2025-26 to 2027-28)

Financial year	Capital (£m)	Revenue (£m)
2025-26	3.6	5.2
2026-27	5.8	5.4
2027-28	4.0	5.5
2028-29	1.4	5.7

Source: Data supplied by the Trust

Local and regional digital projects

- 42 The Trust is working on several local and regional digital projects to improve services. These include systems to support screening services, such as lung and newborn screening; updates to the Trust's website to improve accessibility and compliance; and cyber security improvements (see **paragraph 39**). The Trust is also exploring and piloting the use of AI and automation tools (see **paragraph 31**).
- 43 Updates to the Knowledge, Research and Information Committee show that the Trust has plans in place to deliver this work. They also show that projects are reported through agreed governance arrangements. The Digital and Data Assurance Reports highlight that staff capacity is stretched. As a result, some programmes rely on temporary or interim support. This has caused delays and revised milestones in projects such as the web estate transformation.

Adopting national digital systems

- 44 The Trust is actively adopting national digital solutions as part of the 'Once for Wales' approach. It works closely with key partners, including Digital Health and Care Wales (DHCW), the Welsh Government, and other NHS Wales bodies. The Trust is involved in major projects such as LIMS, Radiology Informatics System Procurement (RISP), and the Cancer Network Information System Cymru (CaNISC).
- 45 The Trust reports that roles and responsibilities are not always clear between itself, DHCW, and the Welsh Government. Digital and Data Assurance Reports show that delays to national systems are ongoing and significant. These delays make it hard to manage risks and progress digital change. Many of the delays are outside the Trust's control and depend on national partners and system-wide capacity. As a result, the Trust's progress in modernising digital services depends heavily on the pace of national delivery.

- 46 Digital and Data Assurance Reports provide a reasonable overview of progress and risks for national digital programmes. But they do not always include clear timelines or detailed plans for dealing with challenges. This makes it hard to know when projects will finish. The reports refer to partnership working on individual programmes but give limited insight into how well these arrangements operate overall. As a result, it is difficult for the Board to assess if partnership issues are delaying progress or if joint working is strong enough to support major programmes.

Evaluating digital solutions

- 47 The Trust has some ways to review how well its digital systems work, but these are not used consistently across the organisation. Some projects aim to be easy to use, accessible, and in line with the Welsh Digital Service Standard. There are good examples, such as website improvements and systems that support screening services. But this approach is not applied to all digital work. User feedback and checks after systems go live are not always carried out, and measures of success are not used for every project. This makes it hard to know if systems improve efficiency or productivity. As a result, the Trust does not have a clear way to assess its digital solutions.

Recommendations

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

R1 The Trust should strengthen its Digital and Data Strategy and route map by setting clear milestones; identifying resource needs; and assigning accountable officers for each priority. **(Paragraphs 11 to 13)**

R2 The Trust should improve Board and committee reporting so updates clearly show how programme progress supports the aims of the Digital and Data Strategy. **(Paragraph 17)**

R3 The Trust should take a more structured approach to understanding and developing its digital workforce capability by:

- 3.1** developing a consistent approach to understanding the digital skills it needs to deliver its digital ambitions and assessing these through major digital and data programmes **(paragraph 32)**; and
- 3.2** introducing a training programme that offers targeted, role-specific learning, including data skills, digital skills, and change capability **(paragraph 33)**.

- R4** The Trust should enhance its approach to digital inclusion by:
- 4.1** creating a digital inclusion plan that better sets out its priorities, actions, measures, and how digital exclusion risks will be managed across all service areas (**paragraph 37**); and
 - 4.2** improving reporting so progress on digital inclusion and engagement is clear, with regular updates on actions, outcomes, and impact (**paragraph 38**).

- R5** The Trust should strengthen its medium-term planning for digital investment by clearly linking funding decisions to priorities in the Digital and Data Strategy. (**Paragraph 39**)

- R6** The Trust should improve reporting on national digital programmes by:
- 6.1** providing clearer timelines, key dependencies, and the impact of delays on the Trust's wider digital transformation (**paragraph 46**); and
 - 6.2** giving clearer insight into how well partnership arrangements are working and where joint working may be slowing progress (**paragraph 46**).

- R7** The Trust should adopt a consistent, organisation-wide approach to evaluating digital solutions. This should include user feedback, post-implementation reviews, and clear measures of success. (**Paragraph 47**)

Appendices

1 About our work

Scope of the audit

The goal of this audit is to find out if the Trust 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 Trust have a well-led and appropriately resourced approach to digital transformation?
- Is the Trust developing the digital skills, capacity, and capability of its workforce?
- Does the Trust 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 Trust engage effectively with staff, partners, patients/service users to deliver its digital transformation ambitions and minimise digital exclusion risks?
- Is the Trust 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 and Social Care: A plan for digital health and social care policy paper; and
- NHS England Transformation Directorate: What good looks like framework.

Methods

We asked the Trust 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 governance documents. These included: Cyber Resilience Unit Cyber Security Assessment Report (2024), Board Work Plan 2025-26, Knowledge, Research, and Information Committee Work Plan 2025-26, and Terms of Reference for Committees.
 - Key strategies and plans. These included: Digital and Data Strategy, Long Term Strategy 2023-35, IMTP 2025-28, Digital Priorities for 2026-27, Annual Report 2025-26, A Strategic Approach to Infrastructure Development in Public Health Wales, People Strategy 2025-35.
 - Key risk management documents, including the Board Assurance Framework and Strategic Risk Register.

- Reports prepared by the Trust and with other relevant external bodies. These included: ‘Digital technology and health inequalities: a scoping review’ (jointly with The Kings Fund); ‘Population health in a digital age: The use of digital technology to support and monitor health in Wales’ (jointly with Bangor University).

We interviewed the following key stakeholders:

- Vice Chair
- Non-Executive Director, Public Health
- Non-Executive Director, Digital, and Data
- Head of Research and Evaluation
- Director of Research, Data, and Digital

We observed Board meetings as well as meetings of the Knowledge, Research, and Information Committee.

2 Key terms in this report

Term	Description
Artificial Intelligence (AI)	AI is the ability of machines, computer systems, or robots to mimic human intelligence, learning, and decision-making to perform specific tasks.
Cancer Network Information System Cymru (CaNISC)	CaNISC is a national cancer information / tracking system in NHS Wales that has been subject to a programme of withdrawal and replacement, with associated delivery and cyber-risk considerations.
Cyber Assessment Framework (CAF)	CAF is a National Cyber Security Centre (NCSC) tool designed to help organisations, particularly those in critical infrastructure like energy, health, and transport, assess their cyber resilience.
Cyber Resilience Unit (CRU)	The NHS Wales CRU, established in 2021 and hosted by Digital Health and Care Wales (DHCW), is an independent team responsible for implementing and monitoring NIS regulations to boost cybersecurity across the Welsh health sector.
Digital and Data Strategy	The Digital and Data Strategy sets out how the organisation will use digital and data to support its long-term plans.

Term	Description
Digital Service Standards for Wales	The Digital Service Standard for Wales is a set of principles developed by the Welsh Government and Digital Public Services Wales to help public bodies design and deliver user-centred, accessible, bilingual and inclusive digital services. It defines what 'good' digital services should look like across the Welsh public sector.
Digital Exclusion	When people are unable to access or use digital services effectively (for example, due to lack of access to devices or the internet, low digital skills, disability, or other barriers), which can limit access to services and worsen inequalities.
Digital Inclusion	Ensuring digital services and information are accessible and usable for everyone, including people with different needs and circumstances, so that using digital does not increase health inequalities.
Digital Maturity Assessment	A digital maturity assessment is a structured review using a recognised framework or model, to measure how an organisation's digital capability is developed across areas such leadership and governance, workforce skills, data, technology, cyber resilience, and service delivery. It provides a baseline and helps track progress over time and prioritise improvement actions.
Digital Route Map	The Digital Route Map is the Trust's delivery plan for implementing its Digital and Data Strategy, listing planned activities and timescales across digital, data, cyber security, and automation.

Term	Description
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.
Laboratory Information Management System (LIMS)	The LIMS in NHS Wales is a unified digital system designed to manage pathology data and sample workflows across all health boards and hospitals.
Network and Information Systems (NIS) Regulations 2018	The NIS Regulations 2018 aim to improve the cybersecurity and resilience of systems that provide essential services.
Newborn Bloodspot Screening Wales System	A Trust-hosted digital system that supports newborn screening services by recording and managing screening information and results.
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.
Radiology Informatics System Procurement (RISP)	RISP is a national digital programme designed to replace and modernise all core radiology informatics systems across every health board.

Term	Description
Strategic Risk Register	A Strategic Risk Register in the NHS is a structured, strategic tool used by boards to monitor risks that threaten the achievement of corporate objectives.
User-centred design	An approach to designing and improving digital services that involves users (eg staff, patients, or service users) throughout the process to understand their needs, test ideas and ensure systems are usable, accessible, and effective.

3 Management Response

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R1	The Trust should strengthen its Digital and Data Strategy and route map by setting clear milestones; identifying resource needs; assigning accountable officers for each priority. (Paragraphs 11 to 13)	Since the review was undertaken, significant progress has been made to strengthen strategic delivery arrangements through the appointment of dedicated Portfolio Leads, the development of a portfolio-level delivery plan aligned to the Digital and Data Strategy, and the implementation of enhanced programme governance and reporting arrangements. Programme milestones, resources, risks and dependencies are now monitored through monthly reporting mechanisms. We will continue to develop these and the reporting to change board and KRIC to fully embed a stronger set of reports. The Executive Director for Research, Data and Digital will be the Accountable Officer for all the strategic priorities in the Digital and Data and Strategy	March 2027	RDD Portfolio Lead
R2	The Trust should improve Board and committee reporting so updates clearly show how programme progress supports the aims of the Digital and Data Strategy. (Paragraph 17)	Reporting arrangements have been strengthened through the introduction of revised programme and portfolio reporting templates which clearly align programme delivery to the strategic objectives of the Digital and Data Strategy. Reporting now provides visibility of milestone achievement, planned activity, risks, issues and future deliverables. These arrangements were implemented during 2025 and will continue to be reviewed to ensure Board and committee	March 2027	RDD Portfolio Lead

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		members receive clear assurance on strategic progress and benefits realisation.		
R3	The Trust should take a more structured approach to understanding and developing its digital workforce capability by:			
R3.1	developing a consistent approach to understanding the digital skills it needs to deliver its digital ambitions and assessing these through major digital and data programmes (paragraph 32).	Public Health Wales recognises the importance of understanding workforce digital capability and maintaining an appropriate baseline of digital skills. Whilst the HEIW Digital Capability Framework provides a useful high-level assessment of digital confidence, it is not sufficiently tailored to the specialist skills required to deliver major digital and data transformation programmes. Public Health Wales will therefore adopt a programme-based approach, undertaking capability assessments at the outset of major programmes and periodically throughout delivery. This will enable the organisation to establish workforce baselines, identify capability gaps and monitor improvements against programme requirements. In addition, consideration will be given to developing a proportionate local assessment approach to support workforce planning across digital and data services.	Embedded into all current and new programmes by December 2026	RDD Portfolio lead

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R3.2	introducing a training programme that offers targeted, role-specific learning, including data skills, digital skills, and change capability (paragraph 33).	Public Health Wales has already embedded skills and capability assessments within several major programmes, including the development of the Cloud Capability Plan, which identifies specific capability gaps and informs targeted development activities. Building on this approach, Public Health Wales will further strengthen role-specific learning and development arrangements by aligning training plans to identified capability needs, ensuring staff have access to appropriate digital, data, leadership and change management skills development to support delivery of strategic digital programmes and services.	July 2027	Head of Digital Experience / Head of Data Science
R4	The Trust should enhance its approach to digital inclusion by:			
R4.1	creating a digital inclusion plan that better sets out its priorities, actions, measures, and how digital exclusion risks will be managed across all service areas (paragraph 37).	Public Health Wales clearly set out its approach to digital inclusion in a single document published on its website.	March 2027	Head of Digital Services and Experience
R4.3	improving reporting so progress on digital inclusion and engagement is clear, with regular	Agree – Public Health Wales will improve its reporting of delivery in our routine updates and iterate this. Once we have fully articulated our approach to inclusion, we will revise the reporting to reflect this.	July 2027	RDD Portfolio Lead, Head of Digital Experience

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
	updates on actions, outcomes, and impact (paragraph 38).			
R5	The Trust should strengthen its medium-term planning for digital investment by clearly linking funding decisions to priorities in the Digital and Data Strategy. (Paragraph 39)	As part of our IMTP process, the Trust creates a forward plan of digital programmes that will require investment over the next 3 years. The Trust will include this more explicitly within its IMTP as a separate section. Whilst annual funding arrangements set by the Welsh Government present challenges for longer-term financial planning, Public Health Wales will continue to strengthen the alignment between strategic priorities, infrastructure roadmaps, business cases and investment decisions to support sustainable digital transformation.	March 2027	Executive Director for Research, Data and Digital
R6	The Trust should improve reporting on national digital programmes by:			
R6.1	providing clearer timelines, key dependencies, and the impact of delays on the Trust's wider digital transformation (paragraph 46).	Public Health Wales recognises the importance of providing clear visibility of programme timelines, dependencies and the impact that delivery risks may have on wider organisational transformation objectives. Significant improvements have been made since the review through the introduction of programme and portfolio planning arrangements that formally identify and monitor milestones, dependencies, risks and issues across digital and data programmes. Monthly highlight reporting to	July 2027	RDD Portfolio Lead

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R6.2	giving clearer insight into how well partnership arrangements are working and where joint working may be slowing progress (paragraph 46) .	Programme Boards provides transparency on delivery progress, key dependencies and emerging risks, with strategic issues escalated through established governance routes to ensure wider organisational impacts are understood and managed. Going forward, Public Health Wales will continue to strengthen portfolio-level reporting by providing greater visibility of interdependencies between programmes and the potential impact of delays on strategic outcomes, enabling informed decision-making and proactive risk management. Public Health Wales acknowledges that effective partnership working is critical to the successful delivery of digital transformation. Existing programme governance arrangements include stakeholder mapping, communication and engagement plans, defined governance structures and risk management processes that identify and manage delivery risks associated with partner organisations. Whilst these arrangements are established within programmes, Public Health Wales recognises that there is an opportunity to provide greater organisational visibility of partnership effectiveness, particularly where dependencies on external organisations may influence programme delivery. Reporting arrangements will therefore be enhanced to provide clearer commentary on the effectiveness of partnership working, progress against shared objectives, management of cross-organisational dependencies and any impacts arising from delays or constraints within partner organisations. This will	July 2027	RDD Portfolio Lead, Head of Digital Experience

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		support improved transparency, accountability and decision-making across the digital transformation portfolio.		
R7	The Trust should adopt a consistent, organisation-wide approach to evaluating digital solutions. This should include user feedback, post-implementation reviews, and clear measures of success. (Paragraph 47)	Evaluation activities are undertaken across digital and data programmes through requirements tracking, programme closure reporting and lessons learnt exercises. To strengthen organisational consistency, Public Health Wales will develop a more standardised framework for post-implementation review and benefits evaluation, ensuring that user feedback, achievement of expected outcomes, lessons learned and measures of success are systematically captured and reported across all digital programmes and services.	March 2027	RDD Portfolio Lead

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.



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