



Iechyd a Gofal
Digidol Cymru
Digital Health
and Care Wales

Tŷ Glan-yr-Afon
21 Heol Ddwyreiniol Y
Bont-Faen, Caerdydd
CF11 9AD

Tŷ Glan-yr-Afon
21 Cowbridge Road
East, Cardiff
CF11 9AD

Our ref: FOI/4907525

Date: 07/12/2023

Thank you for your request for information, which we have dealt with under the provisions of the Freedom of Information Act 2000 (the 'Act').

You asked for information on Digital Health and Care Wales' (DHCW) Information Governance arrangements, safeguards and processes.

We hold this information. We have repeated your request below and provided our response to each question in turn in bold.

Please note, the NHS in Wales is constituted by a number of organisations. This includes seven local Health Boards, three NHS Wales Trusts, two Special Health Authorities and range of other organisations such as GP practices, pharmacies and dentists who are separate organisations but provide NHS Wales services. Each organisation will have in place its own arrangements, safeguards and processes for ensuring that information is managed appropriately.

DHCW is the national organisation that builds and designs digital services for health and care in Wales. The response provided below, is in relation to DHCW's Information Governance arrangements, safeguards and processes only. This response does not reflect other organisations arrangements, safeguards and processes in ensuring that information is managed appropriately. We suggest if you would like this information from these organisations, you make a request directly to them. Details on how to contact other NHS Wales organisations can be found: <https://www.nhs.wales/about-us/> and <https://111.wales.nhs.uk/LocalServices/Default.aspx>

"Who is your appointed Caldicott Guardian and Senior Information Risk Owner?"
DHCW's Executive Medical Director, Rhidian Hurlle has the responsibility as Caldicott Guardian for the organisation, and is the Chief Clinical Information Officer for Wales. DHCW's Executive Director of Operations, Sam Lloyd has responsibility as Senior Information Risk Owner for the organisation.

"Do you have access to the National Integrated Audit System? If so, how many times do you utilise on a weekly basis over the past 12 months."



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DHCW is responsible for the management, maintenance and continued improvement of the National Intelligent Integrated Audit Solution (NIIAS). In addition to these responsibilities, DHCW also utilises NIIAS to review any potential instances by DHCW staff of inappropriate access to national systems integrated with NIIAS. NIIAS is reviewed on a daily basis.

Each organisation will be responsible for monitoring NIIAS in relation to their own staff, and will be responsible for investigating whether the access was appropriate and ensuring there are processes in place should access have been identified as inappropriate.

“In the past 2 years how many employees have been disciplined for inappropriate access to patient data (broken down by digital and paper records).”

DHCW has not disciplined any DHCW employees in the last two years for inappropriately accessing patient records.

Each organisation will be responsible for monitoring and, where appropriate, disciplining their staff where there has been inappropriate access to patient records.

“What percentage of your total employed or contracted staff are compliant with any nationally available mandated Data Protection training?”

DHCW staff undertake statutory and mandatory Information Governance elearning training every two years. 90% of DHCW employees have undertaken elearning training in the past two years as of 16th November 2023.

Please note, this figure includes those staff members who may not have completed this elearning because they have been unable to, i.e. staff who may be on long term sickness or maternity leave when the two year period elapsed. The elearning provided, is one method of informing DHCW staff of their responsibility to Information Governance/ Data Protection and is supplemented by other methods by the Information Governance team, such as presentations to new staff as part of the induction process or tailored training provided to staff.

“How many employees do you have that are directly responsible for providing advice on matters of Data Protection and Confidentiality.”

As of 16th October 2023, DHCW has 21 staff with responsibility for providing advice and assistance on Information Governance / Data Protection.



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This includes providing advice on national programmes, projects and systems DHCW is responsible for, a team with specific responsibilities for carrying out the Data Protection Officer role for subscribed GP practices, maintaining and improving a number of tools, services and frameworks which help improve and monitor organisations compliance to Information Governance / Data Protection and ensuring DHCW's own compliance with Information Governance / Data Protection legislation.

“How many Subject Access Requests have you received from patients over the past 12months.”

DHCW have received 17 requests, which have formally been recorded as Subject Access Requests from November 2022 to 16th November 2023.

Please note, DHCW does not hold medical records. Medical records will be held by the organisation that provided the individual the healthcare or treatment they received. This could be their Local Health Board where they received treatment in a hospital, their GP surgery or services received by their local authority.

This response has been provided in the spirit of the Freedom of Information Act. If you are not satisfied with my response or the process followed, you have a right to complain and request a review. You should forward your complaint to:

Darren Lloyd
Data Protection Officer
Digital Health and Care Wales
Tŷ Glan-yr-Afon
21 Cowbridge Road East
Cardiff
CF11 9AD

Should you wish to take your complaint further, if you are still unhappy with the decision after review, you can contact the:-

Information Commissioner's Office - Wales
2nd Floor,
Churchill House,
Churchill Way,
Cardiff,
CF10 2HH



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Telephone: 0330 414 6421
Fax: 029 2067 8399
Email: wales@ico.gsi.gov.uk

If you have any queries about this request do not hesitate to contact me.

Yours Sincerely,

Marcus Sandberg
Senior Information Governance Officer
Information Governance
Digital Health and Care Wales