



PWYLLGOR DIGIDOL, DATA AC ARLOESI
DIGITAL, DATA AND INNOVATION COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	21 July 2026
TEITL YR ADRODDIAD: TITLE OF REPORT:	Data Protection Impact Assessment Assurance Report
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Huw Thomas, Executive Director of Finance
SWYDDOG ADRODD: REPORTING OFFICER:	Anthony Tracey, Director of Digital, Data and Technology

Pwrpas yr Adroddiad (dewiswch fel yn addas)

Purpose of the Report (select as appropriate)

Er Sicrwydd/For Assurance

ADRODDIAD SCAA

SBAR REPORT

Sefyllfa / Situation

This report provides a progress update on the management of Data Protection Impact Assessments (DPIAs) during the current financial year, including the volume completed, the number currently in progress, and the steps being taken to improve oversight of the process. It highlights positive progress in embedding DPIAs within project and service change activity, while also recognising the operational challenges that continue to affect timely completion.

These include late submissions, variable quality of initial drafts, increasing demand on Information Governance (IG) capacity, and dependencies on service areas and third-party providers. The report sets out the actions being taken to improve transparency, strengthen early engagement, and provide clearer assurance on how privacy risks are being identified, managed and mitigated across the organisation.

Cefndir / Background

DPIAs are a key element of the Health Board's IG framework. They provide a structured way of identifying and managing privacy risks before new projects, systems, services or changes to existing processes are implemented. This is particularly important where proposals involve the processing of personal data, special category data, new technologies, data sharing, or changes to the way patient and staff information is collected, used or stored.

Under the UK General Data Protection Regulation (UK GDPR), organisations are required to complete a DPIA where processing is likely to result in a high risk to individuals' rights and freedoms. Within a healthcare setting, this requirement is especially relevant because of the sensitivity of the information held by the Health Board and the potential impact on patients, service users and staff if information is not handled appropriately.

The DPIA process supports the principle of privacy by design and default by ensuring that information risks are considered at the earliest possible stage. It also helps project and service teams to understand their responsibilities, document the lawful basis for processing, assess

data flows, identify security and confidentiality risks, and agree appropriate mitigations before implementation.

Effective completion of DPIAs provides assurance that the Health Board is taking a proactive and proportionate approach to data protection compliance. It also supports transparency, strengthens accountability, and helps maintain public confidence that personal information is being managed safely, lawfully and ethically.

The increasing pace of digital transformation, service redesign and third-party system use has increased the volume and complexity of DPIAs requiring review. While this demonstrates greater awareness of IG requirements, it also places additional demand on the IG Team and can create challenges where assessments are submitted late, lack sufficient detail, or depend on information from service areas or external providers.

Asesiad / Assessment

This section provides an update on the areas previously highlighted to the Committee, including the challenges affecting the timely completion of DPIAs, the actions being taken to strengthen the process, and the current position in relation to the number of DPIAs completed, in progress, on hold or not yet started. It is intended to provide assurance on progress since the previous [update](#), while also setting out the further improvements planned to increase transparency, improve workflow management and support earlier engagement with services and project teams.

Challenges

The key challenges associated with the DPIA process have previously been reported to the Committee. In summary, these relate to late submissions, variable quality and completeness of initial drafts, limited awareness of when a DPIA is required, capacity pressures within the IG Team, and dependencies on service areas and third-party providers. These issues continue to influence the timeliness of completion and are being addressed through the improvement actions set out below.

Addressing Challenges Going Forward

To strengthen the DPIA process and reduce the operational pressures currently experienced by the IG Team, a series of targeted actions will be implemented:

- **Early Engagement and Expanded Training**

We plan to enhance our IG training by incorporating a dedicated DPIA awareness module for project managers and service leads. This will ensure DPIAs are initiated at the earliest stage of project planning, reducing last-minute submissions and enabling proactive risk management. In addition, we will review and update our digital project proposal form to include mandatory checks, ensuring that no project is added to the work plan without prior approval from both IG and Cyber Security teams. These changes aim to improve compliance rates, strengthen governance, and embed privacy considerations into the project lifecycle from the outset.

Progress: Since the previous report to the Committee, work has progressed to address the challenges identified in the DPIA process. This has included strengthening early engagement with project and service teams (Targeted Training has been delivered to Project Managers), reviewing how DPIAs are identified through digital project initiation routes, and developing clearer workflow categories to improve reporting and transparency. Further work is underway to improve guidance, refine templates, and introduce more structured tracking of DPIAs through each stage of the process.

- **Improved Submission Quality**

Improve our guidance and templates to project teams to ensure DPIA drafts include all necessary details, such as data flows, technical controls, and third-party arrangements. This will reduce the need for multiple review cycles and improve efficiency.

***Progress:** Work has commenced to improve the quality and completeness of DPIA submissions. This includes reviewing the current guidance and templates provided to project teams to ensure that key information is captured at the point of submission, including data flows, technical controls, third-party arrangements and proposed mitigations. This is intended to reduce the number of review cycles required and support more timely completion of DPIAs. Discussions have taken place with national IG leads on developing a national DPIA template. While this work has progressed, not all organisations have adopted the template and there remains some uncertainty about national-level approval. HDdUHB has agreed to test and use the national template and is currently doing so alongside several other organisations across Wales.*

- **Enhanced Tracking and Visibility**

To strengthen oversight and improve efficiency, we will develop a DPIA tracking dashboard that provides real-time visibility of progress at each stage of the assessment process. This dashboard will incorporate sub-categorisation of all DPIAs currently marked as “In Progress,” breaking them down into specific workflow stages such as “IG Awaiting Initial Draft,” “With IG for Review,” “With Service/Provider for Comment,” and “On Hold.”

This enhanced level of detail will deliver several benefits. It will improve transparency for the Information Governance Sub-Committee (IGSC) and for service areas that have requested IG support, ensuring they can clearly see where their DPIA sits in the process. It will also help identify bottlenecks and delays, enabling timely intervention and better resource allocation. Ultimately, this approach will support more efficient DPIA completion, reduce compliance risks, and foster stronger collaboration between IG and project teams.

***Progress:** Work has progressed to improve tracking and visibility of DPIAs through the development of clearer workflow categories. DPIAs currently recorded as “In Progress” are being broken down into more specific stages, including those awaiting an initial draft, with IG for review, with service or third-party providers for comment, with Cyber Security, on hold, or awaiting senior sign-off. This will support more transparent reporting to the IGSC and improve the ability to identify delays, bottlenecks and areas requiring escalation.*

- **Resource Planning and Capacity Management**

The IG Team will undertake a comprehensive review of resource allocation to ensure capacity aligns with the growing demand for DPIA support. This review will include an assessment of current workloads, identification of peak periods, and evaluation of options to strengthen resilience during times of high activity.

Potential measures include introducing temporary support arrangements, to alleviate pressure during critical phases. Additionally, prioritisation protocols will be established to ensure that high-risk projects and those with significant compliance implications receive expedited attention.

By implementing these strategies, the IG Team aims to maintain service quality, reduce delays, and ensure that DPIAs are completed promptly without compromising the thoroughness of risk assessments. This proactive approach will help safeguard compliance and support the organisation's commitment to data protection and patient trust.

Progress: *Limited progress has been made to review IG capacity against current and forecast DPIA demand. This will include considering workload pressures, identifying areas where DPIA activity can be prioritised according to risk, and ensuring higher-risk projects receive appropriate focus. Further consideration is being given to resilience arrangements where demand exceeds available capacity, with escalation routes to be used where delays may affect delivery timescales or compliance assurance.*

Consideration should be given to allocating dedicated resource to support Research and Development activity. A number of proposals are being submitted, including initiatives linked to TriTech and other research projects, and additional support would help improve the timeliness of DPIA review and completion. It may also be appropriate to explore whether CGI could provide further support in this area to help manage incoming requests more effectively.

- **Strengthened Third-Party Governance**

Future contracts with external providers will include clear clauses defining DPIA responsibilities and timelines. This will improve accountability and reduce delays caused by dependency on third-party input.

Progress: *Limited progress has been made in strengthening third-party governance within the DPIA process. Work is ongoing to improve contract terms and conditions so that supplier responsibilities for data protection, information security, DPIA support and timely provision of information are clearly defined. This will support greater assurance that personal data is managed safely, that suppliers comply with the Health Board's requirements, and that appropriate routes for escalation or recourse are available where contractual or compliance expectations are not met.*

Summary

Overall, progress has been made in addressing the challenges previously reported to the Committee, particularly in relation to improving early engagement, strengthening DPIA workflow visibility, and reviewing the quality of submissions. However, progress has been slower than expected due to ongoing capacity pressures within the IG Team and the increasing volume and complexity of DPIA requests. The current position demonstrates that the improvement actions remain appropriate, with further work required to embed them consistently and to ensure that the pace of delivery is sustainable.

Going forward, the Health Board would like to move to a more proactive and transparent DPIA process, with clearer expectations for services and project teams, improved supplier engagement, better tracking of each stage of the process, and more effective prioritisation of high-risk work. This will support greater assurance to the Committee that privacy risks are being identified and managed appropriately, while recognising that delivery will need to be aligned to available capacity and organisational priorities.

Number of DPIAs Completed and In Progress

The table below provides an overview of the DPIAs received by the IG Team during the reporting period, showing the current position across completed, in progress, on hold and not yet started assessments. This information is intended to provide the Committee with greater

visibility of demand, throughput and the level of work still requiring review or further action. It also supports the wider assessment that, while progress continues to be made, the volume and complexity of DPIA activity remains a key factor affecting overall timescales and capacity.

2025/2026	Enquiry	Level 1	Level 2	Level 3	Total
DPIA Level (Completed)	54	8	27	11	100
DPIA Level (In Progress)	7	2	20	20	49
DPIA Level (On Hold)	6	0	0	0	6
DPIA Level (Not Started)	36	3	2	1	42
Total	103	13	49	32	197

The volume of DPIAs this year reflects the organisation's commitment to embedding privacy considerations into all new initiatives, particularly in response to increased digital transformation and data-sharing requirements.

Conclusion

In conclusion, the Health Board continues to make progress in strengthening the DPIA process and embedding privacy considerations within project and service change activity. However, progress has been slower than expected due to ongoing capacity pressures, increasing demand and the complexity of some assessments. The actions described in this report remain appropriate and are intended to improve early engagement, submission quality, tracking, prioritisation and third-party accountability. While further work is required to fully embed these improvements, the Committee can take assurance that the key challenges are understood, improvement activity is underway, and the DPIA process continues to support the identification and management of IG risks.

Argymhelliad / Recommendation

The Committee is requested to:

- **RECEIVE ASSURANCE** that the key issues are understood and that improvement actions are underway to strengthen early engagement, improve submission quality, enhance tracking and visibility, support prioritisation of high-risk Data Protection Impact Assessments (DPIAs) and strengthen third-party accountability.
- **NOTE** the progress update provided in relation to the management of DPIAs, including the current position on completed, in progress, on hold and not yet started assessments;
- **NOTE** the ongoing challenges affecting timely completion, particularly capacity pressures within the IG Team, increasing demand, variable submission quality and dependencies on service areas and third-party providers;

Amcanion: (rhaid cwblhau)

Objectives: (must be completed)

Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.1.3 Seek assurance that the digital, data and IG implications and risks arising from the development of the Health Board's corporate strategies and plans or those of its stakeholders and partners are considered and mitigated.
	3.1.6 Seek assurance that there is a robust IG and security framework within the Health Board and

	encourage a strong IG and security culture across the organisation. 3.1.7 Seek assurance that the Health Board is meeting its responsibilities with regard to the General Data Protection Regulations, the Freedom of Information Act, Caldicott Principles, Records Management, Clinical Coding, Information Sharing, national IG policies and the Information Commissioner's Office guidance. 3.1.8 Seek assurance of the Health Board's compliance against relevant statutory requirements, internal and external standards and assessment criteria, via the IG Toolkit, Cyber Assessment Framework (CAF) any other relevant requirements / assessments, and audits, inspections and reviews, including the implementation of Audit Wales, Health Inspectorate Wales and Internal Audit recommendations.
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	Not applicable
Parthau Ansawdd: Domains of Quality Quality and Engagement Act (sharepoint.com)	7. All apply
Galluogwyr Ansawdd: Enablers of Quality: Quality and Engagement Act (sharepoint.com)	6. All Apply
Amcanion Strategol y BIP: UHB Strategic Objectives:	All Strategic Objectives are applicable
Amcanion Cynllunio Planning Objectives	All Planning Objectives Apply
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2021-2022	9. All HDdUHB Well-being Objectives apply

Gwybodaeth Ychwanegol: Further Information:	
Ar sail tystiolaeth: Evidence Base:	Not applicable
Rhestr Termiau:	Included within the main body of the report

Glossary of Terms:	
Partïon / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Digidol, Data ac Arloesi Parties / Committees consulted prior to Digital, Data and Innovation Committee:	Information Governance Sub-Committee

Effaith: (rhaid cwblhau) Impact: (must be completed)	
Ariannol / Gwerth am Arian: Financial / Service:	There are no direct financial implications arising from this report. However, failure to complete DPIAs appropriately may expose the Health Board to regulatory action, financial penalties, remediation costs, or delays to projects and service changes. Strengthening the DPIA process will support better planning, reduce rework and improve value for money through earlier identification of IG requirements.
Ansawdd / Gofal Claf: Quality / Patient Care:	Effective DPIA completion supports safe, lawful and appropriate use of patient and staff information. By identifying privacy, confidentiality and information security risks at an early stage, the DPIA process helps protect patients, support service quality and maintain confidence in digitally enabled care. Delays or incomplete assessments may increase the risk of privacy issues being identified late in project delivery.
Gweithlu: Workforce:	The report identifies continued capacity pressures within the IG team and the need for clearer expectations across services and project teams. Improved guidance, training and earlier engagement will support staff to understand when a DPIA is required, improve the quality of submissions and reduce avoidable rework.
Risg: Risk:	The main risks relate to delayed completion of DPIAs, variable submission quality, limited capacity, and reliance on third-party information. These risks may affect the Health Board's ability to evidence compliance and provide timely assurance that privacy risks are being identified and mitigated. The improvement actions described in the report are intended to strengthen controls and reduce residual risk.
Cyfreithiol: Legal:	DPIAs are a key requirement under UK GDPR where processing is likely to result in a high risk to individuals' rights and freedoms. Strengthening the DPIA process supports compliance with UK GDPR, the Data Protection Act 2018, the common law duty of confidentiality and relevant IG standards. Failure to complete DPIAs appropriately may increase the likelihood of regulatory scrutiny or non-compliance.
Enw Da: Reputational:	Public and staff confidence depends on the Health Board demonstrating that personal information is managed safely, lawfully and transparently. Weaknesses or delays in the DPIA process could affect confidence in the organisation's ability to protect information, particularly

	where new digital systems, data sharing or third-party arrangements are involved.
Gyfrinachedd: Privacy:	The DPIA process directly supports privacy by design and default by ensuring that privacy risks are considered before new processing begins or existing processing changes. The actions outlined in the report will improve the Health Board's ability to identify risks, agree mitigations and provide assurance that personal information is being protected appropriately.
Cydraddoldeb: Equality:	No specific equality impacts have been identified from this report. However, consistent application of the DPIA process helps ensure that personal information is managed fairly, lawfully and transparently across all services and population groups. Where relevant, DPIAs should consider whether data processing may have differential impacts on individuals or groups.

Appendix A – DPIA Category

Level of DPIA	Description
DPIA	Enquiries.
DPIA Level 1	Review of DPIA Screening Questions to assess whether DPIA is required.
DPIA Level 2	Minimal Risks to PII; where a Level 3 – Mandatory / Full DPIA is not required. The IG Team will review the processing (i.e., Section A of the DPIA is completed), identify any risks, make recommendations, and record the required approval.
DPIA Level 3	Mandatory / Full DPIA or Review of External DPIA.

Sub-Categories

Category/Current Position	Description
Enquiry	Includes: sending Link to the online Screening Questions, sending the DPIA Template, determining whether Digital approval has been granted (if required) or providing advice (including meetings). No DPIA or immediate follow up required.
Review of External DPIA	For instance, review of DPIA from an organisation with whom the Health Board will be working in collaboration. To be recorded and updated in the same way as all Level 3 DPIAs.
In Progress - Awaiting Initial Draft	Under discussion as to whether DPIA is required or awaiting department to provide the IG Team with initial draft / screening questions. Those where the Information Asset Register has identified the requirement for completion of retrospective DPIAs.
In Progress - On Hold	The Service has advised that they are not in a position to progress the implementation or Digital Services has advised that the requirement is unable to progress at this time e.g., lack of contract or capacity for implementation.
In Progress - With Service/ Third Party	With the service lead for Review/Comment.
In Progress - With IG	With the IG team lead for Review/Comment.
In Progress - With Cyber Security	Cloud Assessment to be reviewed and assured by the Cyber Security team.
In Progress - DPO Review	IG Managers have developed the DPIA and the IG Risks have been highlighted to the DPO for consideration.
In Progress - For Sign off from Senior Information Risk Owner (SIRO) or Caldicott Guardian (CG)	IG Risks have been highlighted to the Deputy SIRO for Consideration / Review / Sign Off IG Risks have been highlighted to the Deputy Caldicott Guardian for Consideration / Review / Sign Off

Finalised and Signed Off - DPO / IG Team	Finalised by the IG Team and Data Protection Officer
Finalised and Signed Off - Caldicott Guardian (CG)	Finalised by the IG Team and Signed Off by CG
Finalised and Signed Off - Senior Information Risk Owner (SIRO)	Finalised by the IG Team and Signed Off by SIRO
Finalised and Signed Off - SIRO and CG	Finalised by the IG Team and Signed Off by CG and SIRO
Not Required	No PII discovered during Screening questions. Following review of the Screening Questions or initial review of the DPIA, IG has determined that the processing does not require a DPIA.
Withdrawn	Where the Directorate/Service has withdrawn the need for a DPIA e.g., they have decided not to proceed with the processing in question, or the processing has been addressed at a national level.