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Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
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Llywodraeth Cymru
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17 August 2023

Dear Russell and Mark,

Thank you for your letter of 5 July and attached report. The use of digital services across Wales is key to ensuring the effective operation of all health services, and so I welcome the joint Committees' report into Digital Health and Care Wales (DHCW) following this Special Health Authority's first year of operation. I am particularly pleased to see the joint Committees' recommendations align with our current and future plans, also the plans I know that DHCW have in place.

I would also like to draw the joint Committees attention to my Written Statement¹ from 27th July 2023, in which I launched the refreshed Digital and Data Strategy for Health and Social Care in Wales. This provides digital and data transformation direction to help people in Wales lead happier, healthier and longer lives through user-centred digital services built on better digital skills, partnerships, data and platforms. DHCW as our trusted, strategic, digital delivery partner has an integral role in helping WG and NHS Wales achieve the ambitions set out in the Strategy, successful delivery of these recommendations will further strengthen this role and accountability to all.

I have set out my responses to the Report's individual recommendations, as appropriate, in the attached Annex A.

Yours sincerely

Eluned Morgan AS/MS
Y Gweinidog Iechyd a Gwasanaethau Cymdeithasol
Minister for Health and Social Services

¹ <https://www.gov.wales/written-statement-launch-refreshed-digital-and-data-strategy-health-and-social-care>

Written Response by the Welsh Government to the report of the Health and Social Care and Public Accounts and Public Administration joint Committee, titled “Scrutiny of Digital Health and Care Wales”.

Recommendation 1

The Committees recommend that:

The Welsh Government and Digital Health and Care Wales should provide further information about their respective roles in determining DHCW’s priorities and delivering major projects. This should include:

- *How the Welsh Government assures itself that DHCW’s priorities are aligned to and support delivery of the Welsh Government’s priorities for health and care in Wales.*
- *How decisions are taken on DHCW’s priorities, including when and by whom.*
- *How DHCW’s Board and executive team monitor progress on major projects, including whether key timelines and milestones are being achieved.*
- *What role, if any, will be played by the NHS Wales Executive.*

Response:

- A. Since the receipt of evidence by the joint Committees, the Welsh Government appointed Mike Emery as its new Director of Technology, Digital and Innovation within Health and Social Services in January 2023. Mike is also the Chief Digital Officer (CDO) for Health and Social Care for NHS Wales. The CDO meets with the Chief Executive Officer (CEO) of DHCW on a fortnightly basis, to discuss and decide priorities for delivery, including any resultant challenges, aligned with Welsh Government / NHS Wales evolving priorities – typically these are set out in Programme for Government priorities, the Digital and Data Strategy for Health and Social Care and additional priorities responding to specific needs. DHCW, as a Special Health Authority, also undertakes the annual Integrated Medium Term Planning (IMTP) process¹ and participates in quarterly Integrated Quality Planning and Delivery meetings (IQPD) and six monthly Joint Executive Team (JET) meetings. Individually and collectively, these conversations consider, discuss, challenge, appraise, decide and resolve all points regarding DCHW’s delivery priorities as aligned to Welsh Government priorities.
- B. Within the NHS Executive, the Office of the Chief Digital Officer will be responsible for overseeing digital developments, coordinating and defining technical standards, and ensuring whole system approaches are adopted. This includes working with DHCW to ensure that Once-for-Wales i.e. national systems are implemented, iteratively improved, and adopted across Wales.

¹ Production of plans by all NHS Bodies on an annual basis to meet the prevailing [NHS Wales Planning Framework](#)

- C. The CDO will also chair the proposed National Strategic Portfolio and Investment Board (housed in the NHS Executive). This forum will bring together the Welsh Government and NHS and Social Care representatives to identify, consider, and propose recommendations for the Welsh Government to submit for Ministerial approval. The Board's role will be to:
- a. Review and scrutinise, and recommend to Welsh Government (and so to Ministers) and the NHS Executive, digital and data investments, covering appropriate initiatives across the Health and Social Services' portfolio;
 - b. Act as a Gateway review point for key programmes and projects, aligned to the Welsh Government Gateway process;
 - c. Provide oversight of Health and Social Care digital and data Infrastructure and Architecture;
 - d. Undertake commissioning of delivery partners including DHCW;
 - e. Provide oversight of Health and Social Care data, procurement, interoperability and Artificial Intelligence standards' governance.

Recommendation 2

The Committees recommend that:

The Welsh Government and Digital Health and Care Wales should set out who is responsible for leading the Welsh Community Care Information System programme. This should include information about the programme's Senior Responsible Officers.

If the interim Chief Executive of Betsi Cadwaladr University Health Board is continuing as an SRO for the WCCIS programme, the Welsh Government and DHCW should provide an assessment of whether it is realistic for one individual to undertake both roles concurrently, and information about any steps that are being taken to mitigate any risks associated with the roles being undertaken concurrently.

Response:

: At the time of this submission, the joint SROs (the interim Chief Executive of Betsi Cadwaladr University Health Board and the Deputy Chief Executive at Caerphilly County Borough Council) remain accountable for the successful delivery of the programme. However, in line with revised governance arrangements for all Welsh Government funded Digital Transformation projects, as discussed and agreed between myself, the DHCW Chair and my officials, WCCIS is expected to be among the first programmes transitioning to adopting these arrangements, resulting in DHCW's CEO becoming accountable for WCCIS' delivery.

Recommendation 3

The Committees recommend that:

The Welsh Government and Digital Health and Care Wales should provide the Health and Social Care Committee and the Public Accounts and Public Administration Committee with six-monthly updates on progress on the delivery of the Welsh Community Care Information System. The updates should include information about

expenditure to date, planned expenditure, uptake of WCCIS among health boards and local authorities, engagement or consultation undertaken with relevant partners. The first update should be provided in the responses to this report.

Response:

After recess, I will provide an update to the Committees with further detail on the strategic direction for WCCIS. The future general approach, as set out in the Digital and Data Strategy for Health and Social Care, will be focussed on better sharing of data between settings, enabled by systems/services being better aligned by developments in shared care records across the NHS and Social Care. In terms of agreed budgets, there has to date been no change from the overall position set out in the Audit Wales letter (July 2022) to the PAPAC Chair.

Recommendation 4

The Committees recommend that:

In their responses to this report, the Welsh Government and Digital Health and Care Wales should provide an update on the outcome of the WCCIS contracting strategy review that was due to report by March 2023.

Response:

DHCW will provide an update on this commercially sensitive strategy review. The Welsh Government is supportive of the review which will ensure the programme is able to leverage commercial relationships in the most appropriate way to achieve its vision of more effective use of joined up health and social care data to support the delivery and effective implementation of a digital solution, to further enable the goal of integrated services across health and care.

Recommendation 9

The Committees recommend that:

By the end of 2023 Digital Health and Care Wales should publish a clear, realistic and prioritised plan for increasing its engagement with the social care sector, including public, third and private sector providers, Regional Partnership Boards and the Social Partnership Council. The plan should be developed through engagement with the social care sector, and should include clear timescales and assessment of the resource required for its delivery. DHCW should provide a copy of the plan to the Health and Social Care Committee and the Public Accounts and Public Administration Committee, and provide six-monthly updates on progress against the plan.

Response:

The Welsh Government's recently appointed CDO for Health and Social Care and the Chief Social Care Officer for Wales are working jointly to ensure that Social Care policy priorities are supported within existing digital priorities. Key to achieving this will be DHCW's similar engagement with the Social Care sector.

Recommendation 13

The Committees recommend that:

The Welsh Government and Digital Health and Care Wales should provide further information about their respective roles in providing leadership and drive for digital transformation in health. This should include:

- *How the Welsh Government assures itself that decisions taken by DHCW and other health bodies in Wales on the prioritisation of capital funding align with Ministers' transformation priorities.*
- *How DHCW works with health bodies and encourages them to allocate sufficient funding and other resources to delivering sustainable digital transformation.*

Response:

The Welsh Government provides DHCW with funding (both revenue and capital) from two primary sources: a core allocation (which is profiled around the IMTP plan and monitored via the associated IQPD and JET meetings), and the Digital Priorities Investment Fund (for targeted strategic digital transformation activities). For the latter, proposals must be submitted to the Welsh Government for consideration and demonstrate alignment with priority policy goals, strategic alignment, Ministerial priority areas and Programme for Government commitments.

These are considered by a panel of Welsh Government officials (with a representative from the Welsh Government funded Centre for Digital Public Services) to provide advice on best practice approaches etc before advice is then provided to Ministers on committing funding (both revenue and capital) to a particular digital transformation programme. The improved governance processes to discuss, agree and monitor how DHCW utilises Welsh Government funding to deliver Ministers' transformation priorities is set out in Recommendation 1, B.

Recommendation 14

The Committees recommend that:

The Welsh Government and Digital Health and Care Wales should provide a frank appraisal of the impact of the limited availability of capital funding on the delivery of digital transformation in health services. This should include information about any projects or programmes which have been, or are likely to be, delayed because of a lack of capital funding, an assessment of the implications of such delays, and what alternative approaches are being considered to fund/support growth in the digital space.

Response:

Digital services are becoming less dependent on capital funding as they gradually switch to more cloud-hosted services which require ongoing revenue commitment. Capital funding is still required for underpinning physical infrastructure (e.g. network hardware, desktop and laptop computers, etc).

Due to historic budget settlements from Westminster and the prioritisation of funding for front-line services, there is a growing technical debt within the NHS in Wales,

caused by limited available funding for the replacing of legacy underpinning infrastructure, which presents a cyber risk to NHS Wales. Addressing this technical debt would require significant investments in terms of funding and expertise. This capital pressure is on Health Board and Trust budgets, not on digital transformation programme budgets, which would also require additional ongoing revenue commitments to fund more cloud hosted services to replace some of those currently hosted on-premise.

It is difficult to quantify the impact of a lack of capital on digital transformation projects or programmes in the way the Recommendation has described. As the Committees are acutely aware, there are challenging budget decisions which need to be taken with prioritisation of capital funding to maintain frontline services. This means that programmes need to carefully consider the funding profiles they request, including exploring alternate delivery methods – for example working with other bodies to jointly deliver digital transformation. These are undertaken before funding requests are submitted, so it is not easily quantifiable how the limited available capital impacts on digital transformation.

However, as noted above re technical debt, this is layering modern digital services on top of increasingly aging IT systems (e.g. structural networks and hardware etc), which will only be able to accommodate a certain amount of technical change before they themselves become a barrier to transformation.

Recommendation 16

The Committees recommend that:

We wish to ensure that Digital Health Services are appropriately accessible to patients in Wales when they receive NHS services in England. We recommend that the Welsh Government engage with the UK Government to consider ways in which digital health services in England and Wales can be better aligned and connected.

Response: Accept in Principle

The Welsh Government continues to work successfully with NHS England, at Ministerial and at Official level, with both parties learning lessons from approaches taken to date. Wales is an active member of the Four Nations' group for Health, including work on common data standards. The Health and Social Care CDO will continue to take a lead role in these discussions with counterparts in other areas of the UK. Powys Teaching Health Board is leading work under the Powys Cross Border Pathways programme, with DHCW support, to exchange health data with English NHS Trusts and Integrated Care Systems for patients whose care spans the English/Welsh border. Such cross border working results in a more streamlined patient experience, with less delays encountered (caused by waiting for files) and with better clinical decisions being made by NHS England, for Welsh patients. This will be enabled by improved and fuller access to Welsh data, which will include further work on considering and adopting international standards in relation to data sharing between countries.

In Wales, the approach set out in our Digital and Data Strategy for Health and Social Care (as noted on page 1) is to increase the utilisation of Once for Wales systems, adopting open and consistently applied standards and architecture frameworks to improve interoperability and leveraging existing platforms to simplify access to data by clinicians and support staff. We have a single patient record for secondary care. In primary care we use two system suppliers across Wales to provide the electronic GP record and for community pharmacies we have the all-Wales Choose Pharmacy system. However, health care providers in England have separate strategies for the integration of patient information for those circumstances where the patient moves outside of their geographical care provider in England. This means that Wales' services and systems would need to integrate separately with each health provider and system in England, resulting in very significant technical challenges and requiring substantial investment from both Governments.

NHS England announced² in 2022 a major investment “to support electronic patient records to be in all NHS trusts”. The wording of the statement suggests this is the sharing of data between settings within each Integrated Care System (ICS), rather than between areas of England or potentially with Devolved Governments; officials are seeking to clarify this. The Welsh Government continues to work with NHS England to understand how we explore potential opportunities for sharing digital platforms, whilst retaining data sovereignty for Wales, to benefit Welsh citizens.

² <https://www.gov.uk/government/publications/a-plan-for-digital-health-and-social-care/a-plan-for-digital-health-and-social-care#section-1-embedding-digital-technologies>