

25 June 2026

Dear

ATISN 27049 – Relevant extracts from the Memorandum of Agreement (MoA) and a copy of the latest programme-level risk register relating to the Hwb platform.

Information requested

Thank you for your request which I received on 3 June 2026. You asked for information under the Freedom of Information Act 2000 regarding relevant extracts from the Memorandum of Agreement (MoA), along with copies of any documents mentioned in the MoA that relate to your request and a copy of the latest programme-level risk register relating to the Hwb platform.

Our response

In accordance with our duty under section 1 of the Freedom of Information Act 2000, the Welsh Government confirms that it holds information relevant to your request.

Memorandum of Agreement (MoA)

You have previously received a redacted version of the current Memorandum of Agreement as part of our response to ATISN 26326.

Within the document you received, there is reference to strategic objectives, which can be found by following this link: [Hwb strategic overview - Hwb](#). This was included in my response to you following your recent FOI request ATISN 26945.

Your request states you require this information in relation to:

- Continuity of Hwb services
- Service withdrawal
- Service reduction
- Cessation of funding
- Termination of the agreement
- Transition arrangements following termination
- Responsibilities of Welsh Government and local authorities in the event that Hwb services are materially changed or discontinued.

Hwb is the national digital learning platform for Wales, providing access to a wide range of bilingual tools, services and resources to support teaching, learning and school operations.

The Welsh Government recognises the important role that Hwb plays in improving education standards and supporting practitioners and learners across Wales and remains committed to enabling access to digital tools and services to support this objective. The Programme for Government sets out the priorities and commitments

for the current Senedd term, including support for education and digital learning. In this context, Hwb will continue to be developed and maintained in line with these priorities.

Although it is not possible to comment on arrangements beyond the current funding period, the Welsh Government's long-standing commitment to supporting education through digital services, including Hwb, remains clear, with over a decade of sustained investment. However, as with all public services, funding is agreed in defined cycles rather than on a permanent basis, meaning future arrangements are subject to regular review as part of wider budget-setting processes and long-term planning must remain flexible.

Further to the Memorandum of Agreement, local authorities may hold additional relevant detail to your request in their own local policies that reflects the arrangements with schools.

Programme-level risk register relating to Hwb

We confirm that we hold information falling within the scope of your request for the most recent programme-level risk register relating to Hwb.

I include an appropriately redacted version of the document at Annex A. Redactions have been made under s.43(2) of the Freedom of Information Act.

The withheld information includes assessments of supplier performance risks, contractual dependencies, and mitigation strategies.

Disclosure of this information would be likely to prejudice the commercial interests of both the Welsh Government and its suppliers by enabling existing or prospective suppliers to identify and exploit these vulnerabilities in future negotiations, including by adjusting pricing structures, risk allocation, or contractual terms to their advantage, thereby weakening the ability to secure value for money.

Furthermore, publication of the redacted information would increase the Welsh Government's and specifically Hwb's risk exposure by potentially revealing known weaknesses and risk profiles within supplier arrangements and service delivery. This could be used by malicious actors to identify and target potential vulnerabilities, increasing the likelihood of cyber-attack or service disruption, and compounding the resulting commercial, operational and reputational harm.

Further redactions where risk owners are named, have been made under s.40 of the Freedom of Information Act.

Section 40(2) together with the conditions in section 40(3)(a)(i) or 40(3)(b) provides an absolute exemption if disclosure of the personal data would breach any of the data protection principles.

'Personal data' is defined in sections 3(2) and (3) of the Data Protection Act 1998 ('the DPA 2018') and means any information relating to an identified or identifiable living individual. An identifiable living individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

We have concluded that, in this instance, the information requested contains third party personal data.

Under Section 40(2) of the FOIA, personal data is exempt from release if disclosure would breach one of the data protection principles set out in Article 5 of the GDPR. We consider the principle being most relevant in this instance as being the first. This states that personal data must be:

"processed lawfully, fairly and in a transparent manner in relation to the data subject"

The lawful basis that is most relevant in relation to a request for information under the FOIA is Article 6(1)(f). This states:

"processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child".

In considering the application of Article 6(1)(f) in the context of a request for information under FOIA it is necessary to consider the following three-part test:-

- The Legitimate interest test: Whether a legitimate interest is being pursued in the request for information;
- The Necessity test: Whether disclosure of the information/confirmation or denial that it is held is necessary to meet the legitimate interest in question;
- The Balancing test: Whether the above interests override the interests, fundamental rights and freedoms of the data subject.

Our consideration of these tests is set out below:

1. Legitimate interests

The request does not provide any specific reasons for seeking the personal data. In line with established FOI practice, we have therefore considered disclosure on the basis that it would be to the public at large rather than to the individual requester.

2. Is disclosure necessary?

We do not consider that disclosure of the names of risk owners is necessary to meet any legitimate interest in transparency. The requested information of value can be understood without identifying individuals. Disclosure of names would not add meaningful insight and is therefore not necessary.

3. Balance

Whilst there is a general legitimate interest in transparency and accountability, we do not consider that this extends to the disclosure of the names of staff in this context. The individuals concerned would have a reasonable expectation that their personal data would not be disclosed in response to a request of this nature.

On balance, we consider that the legitimate interests in disclosure are outweighed by the rights and freedoms of the data subjects. Disclosure would therefore be unlawful under Article 6(1)(f) UK GDPR and would breach the fairness principle. Accordingly, the information has been withheld under section 40(2) of the Freedom of Information Act 2000.

As release of the information would not be legitimate under Article 6(1)(f), and as no other condition of Article 6 is deemed to apply, release of the information would not be lawful within the meaning of the first data protection principle. It has therefore been withheld under section 40(2) of the Freedom of Information Act.. Section 40(2) is an absolute exemption and not subject to the public interest test.

Next steps

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response. Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at: Information Rights Unit, Welsh Government, Cathays Park, Cardiff, CF10 3NQ or Email: Freedom.ofinformation@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:
Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Annex A

Risk ID	Risk Description	Inherent	Mitigation	Residual	Further Actions	Target	Owner & Target Date
		I L Overall		I L Overall		I L Overall	
501	[Redacted under s.43(2) of the Freedom of Information Act] There is also a continual increase in the risk of cyber-attacks, [Redacted under s.43(2) of the Freedom of Information Act] which needs to be managed. [Redacted under s.43(2) of the Freedom of Information Act] [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act] In parallel a review of the current Cyber security measures and expertise is underway to determine what more the WG can proactively undertake to protect the breadth of Hwb national services, [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
828	[Redacted under s.43(2) of the	[Redacted under	[Redacted under s.43(2) of the	[Redacted under s.43(2)	[Redacted under s.43(2) of the	[Redacted under	[Redacted under s.40

	Freedom of Information Act] Maintaining a national approach to digital services enables all schools to maximise the transformational benefits of technology, however the 'Once for Wales' approach places an ever-increasing reliance on the Welsh Government, particularly as the Hwb platform emerges as critical national infrastructure for schools in Wales. [Redacted under s.43(2) of the Freedom of Information Act] [Redacted under s.43(2) of the Freedom of Information Act]	s.43(2) of the Freedom of Information Act]	Freedom of Information Act] To strengthen the security posture of the Hwb platform; [Redacted under s.43(2) of the Freedom of Information Act] providing local authorities and schools with active 24/7/365 critical monitoring and protection. [Redacted under s.43(2) of the Freedom of Information Act]	of the Freedom of Information Act]	Freedom of Information Act]	s.43(2) of the Freedom of Information Act]	of the Freedom of Information Act]
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The risk of any service disruption would have a significant impact to schools operations, [Redacted under s.43(2) of the Freedom of Information Act] [Redacted under s.43(2) of the Freedom of Information Act] AI and other advanced technologies) is emerging. It is essential that schools are aware and can embrace the transformational opportunities from emerging technologies, however it is vitally important that schools are aware of the key considerations and risks and can apply							
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	appropriate safeguards commensurate with the diverse and evolving learning needs of schools, not least consideration across different age groups and abilities.						
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
1078	If web filtering does not provide a complete solution [Redacted under s.43(2) of the Freedom of Information Act]on Hwb-managed devices, [Redacted under s.43(2) of the Freedom of Information Act]web filtering may not offer adequate protection	[Redacted under s.43(2) of the Freedom of Information Act]	We are supporting Local Authorities [Redacted under s.43(2) of the Freedom of Information Act], providing real-time advice and guidance to ensure they consider applications that do not support user-level filtering [Redacted under s.43(2) of the	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]--	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

	or user-level reporting. [Redacted under s.43(2) of the Freedom of Information Act]		Freedom of Information Act]				
1363	If a major outage or failure occurs [Redacted under s.43(2) of the Freedom of Information Act], there is a risk that all maintained schools across Wales could lose internet connectivity and access to digital services. [Redacted under s.43(2) of the Freedom of Information Act].-	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
201	If schools do not maintain their	[Redacted under	We are working closely with Local	[Redacted under s.43(2)	[Redacted under s.43(2) of the	[Redacted under	[Redacted under s.40

	Management Information Systems (MIS) [Redacted under s.43(2) of the Freedom of Information Act]there is a risk that the data held [Redacted under s.43(2) of the Freedom of Information Act] will become outdated. [Redacted under s.43(2) of the Freedom of Information Act]	s.43(2) of the Freedom of Information Act]	Authorities and schools, maintaining a proactive approach [Redacted under s.43(2) of the Freedom of Information Act].	of the Freedom of Information Act]	Freedom of Information Act]	s.43(2) of the Freedom of Information Act]	of the Freedom of Information Act]
202	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
1191	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of	[Redacted under s.40 of the Freedom of

		Information Act]		Information Act]		Information Act]	Information Act]
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
204	If services provided by key Hwb partners [Redacted under s.43(2) of the Freedom of Information Act] are not properly maintained and configured, there is a risk that data could be compromised [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
205	If the Hwb platform or other public-facing services fail, there is a risk that users across the education sector will be unable to	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

	access essential digital tools and resources. [Redacted under s.43(2) of the Freedom of Information Act]						
377	If an unknown security vulnerability in the Hwb Cloud platform or associated tools is identified and/or exploited, there is a risk that the platform could be compromised. [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
499	[Redacted under s.43(2) of the Freedom of Information Act] there is a risk that service levels will not be maintained and users may experience issues	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

	with access, security, and performance. [Redacted under s.43(2) of the Freedom of Information Act]						
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
838	If the pace of change and increased accessibility of AI [Redacted under s.43(2) of the Freedom of Information Act] there is a risk that schools will struggle to appropriately adopt these tools into their teaching and learning practices. [Redacted under s.43(2) of the	[Redacted under s.43(2) of the Freedom of Information Act]	We are prioritising horizon-scanning activity to assess the wider implications of AI tools within education, enabling us to provide proactive guidance and support to schools as new risks, opportunities, and technologies emerge.	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

	Freedom of Information Act]						
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
500	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
1124	If Local Authorities fail to commit to the Hwb programme [Redacted under s.43(2) of the Freedom of Information Act] there is a risk that schools may not	[Redacted under s.43(2) of the Freedom of Information Act]	We work closely with local authorities to identify and remove barriers to Hwb adoption, maintaining consistent engagement and providing targeted support where	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

	receive the necessary support to effectively implement and sustain digital learning initiatives. [Redacted under s.43(2) of the Freedom of Information Act]		required. [Redacted under s.43(2) of the Freedom of Information Act]				
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
1404	If the organisation fails to maximise the use of user research to inform decision-making, there is a risk that services may not effectively meet user needs. [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	We are making research widely available and ensuring stakeholders are aware of the findings through ongoing communication and engagement. [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
1574	Access to user groups may	[Redacted under	[Redacted under s.43(2) of the	[Redacted under s.43(2)	[Redacted under s.43(2) of the	[Redacted under	[Redacted under s.40

	become restricted as we look at more detailed research into the new platform and specific areas.	s.43(2) of the Freedom of Information Act]	Freedom of Information Act]	of the Freedom of Information Act]	Freedom of Information Act]	s.43(2) of the Freedom of Information Act]	of the Freedom of Information Act]
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
504	[Redacted under s.43(2) of the Freedom of Information Act] there is a risk that inappropriate content could be made available to learners and other stakeholders, and that unauthorised individuals may gain access to restricted information [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	Tools are in place on Hwb to prevent inappropriate images and language from being published, supported [Redacted under s.43(2) of the Freedom of Information Act]access,	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

1035	[Redacted under s.43(2) of the Freedom of Information Act]; there is a risk that users with disabilities may be unable to access essential information and resources. [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	Publishing standards are in place for Hwb and Gov.wales, and the content team conducts accessibility checks before any material is published to ensure full compliance with required standards. [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
1400	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
1401	There is a risk that outdated [Redacted under		We are continuing to engage [Redacted under s.43(2) of the		[Redacted under s.43(2) of the	[Redacted under s.43(2) of	[Redacted under s.40 of the

	s.43(2) of the Freedom of Information Act] materials may be made available through Hwb or that gaps exist in the provision of up-to-date resources. [Redacted under s.43(2) of the Freedom of Information Act]		Freedom of Information Act] and are streamlining publishing processes to ensure efficient, consistent, and high-quality delivery of content.		Freedom of Information Act]	the Freedom of Information Act]	Freedom of Information Act]
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
1403	There is a risk that the Hwb platform could be compromised, leading to reduced or denied access for users. [Redacted under s.43(2) of the Freedom of Information Act]		Ongoing cyber protection is being provided [Redacted under s.43(2) of the Freedom of Information Act] assessments are also undertaken to ensure continued compliance with required security standards.		[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

1577	There is a risk that the Hwb web platform may experience unplanned downtime [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]		[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
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		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
1402	There is a risk that the platform may become non-compliant with industry standards. [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	We are conducting ongoing accessibility testing and NFR assessments, implementing required changes [Redacted under s.43(2) of the Freedom of Information Act] to ensure continuous improvement and compliance with standards.	[Redacted under s.43(2) of the Freedom of Information Act]		[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]

		Inherent		Residual		Target	
Risk ID	Risk Description		Mitigation		Further Actions	Overall	Owner & Target Date
503	[Redacted under s.43(2) of the Freedom of Information Act] there is a risk that the Service Desk team will be unable to effectively support Hwb users. [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	The Service Desk team is able to respond to queries outside the software [Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]
1034	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.43(2) of the Freedom of Information Act]	[Redacted under s.40 of the Freedom of Information Act]