23 October 2026

Dear

ATISN 27579 – NWSSP Governance Review

Thank you for your request to Welsh Government for information under the Freedom of Information Act (2000) which was received on 27 September 2026, relating to in the 2025 NWSSP Governance Review and Welsh Government Response.

You have stated that your request was based exclusively on the following two documents published by Welsh Government:

- Review of the NHS Wales Shared Services Partnership – Accountability and Governance Arrangements (July 2025) (Independent governance review commissioned by Welsh Government)
- Welsh Government Initial Response to the Review of NWSSP Governance (2025) (Ministerial response outlining required actions, concerns, and identified governance weaknesses)

You requested the following:

SECTION A — WELSH GOVERNMENT OVERSIGHT FAILURES

1. *Provide all internal documents explaining Welsh Government's oversight role over NWSSP.*
2. *Provide all correspondence where Welsh Government acknowledged unclear oversight.*
3. *Provide all internal reviews identifying weaknesses in Welsh Government's governance of NWSSP.*

SECTION B — INTERVENTION FAILURES

1. *Provide all documents detailing planned or actual Welsh Government interventions relating to NWSSP governance.*
2. *Provide all escalation mechanisms proposed or implemented.*
3. *Provide all correspondence where Welsh Government identified risks requiring intervention.*

SECTION C — GOVERNANCE DOCUMENTS NOT CLEAR OR CONSISTENT

1. *Provide all versions of governance documents reviewed by Welsh Government.*
2. *Provide all internal assessments identifying inconsistencies or unclear governance.*
3. *Provide all recommendations issued to NWSSP or Velindre to correct governance weaknesses.*

SECTION D — FAILURE TO ENSURE CLINICAL GOVERNANCE

1. *Provide all documents showing Welsh Government's assessment of NWSSP's clinical governance.*
2. *Provide all correspondence where Welsh Government raised concerns about clinical governance gaps.*
3. *Provide all actions Welsh Government required NWSSP or Velindre to take.*

SECTION E — FAILURE TO ENSURE PROPER HOSTING ARRANGEMENTS

1. *Provide all documents showing Welsh Government's assessment of Velindre's hosting of NWSSP.*
2. *Provide all correspondence where Welsh Government identified hosting failures.*
3. *Provide all evidence showing why Welsh Government did not require Velindre to invoke Hosting Agreement section 20.*

SECTION F — FAILURE TO ENSURE EXTERNAL SCRUTINY

1. *Provide all documents showing Welsh Government's assessment of NWSSP's lack of external scrutiny.*
2. *Provide all correspondence with Audit Wales regarding NWSSP audit gaps.*
3. *Provide all internal discussions about the absence of standalone NWSSP accounts.*

SECTION G — FAILURE TO ENSURE GOVERNANCE OF DIRECTLY COMMISSIONED SERVICES

1. *Provide all governance documents for services Welsh Government directly commissioned but placed under NWSSP (Infected Blood, TRAMS, International Recruitment, Emergency Planning).*
2. *Provide all SLAs for these services.*
3. *Provide all correspondence clarifying governance responsibilities.*

SECTION H — FAILURE TO ENSURE ATTENDANCE AND EFFECTIVE PARTNERSHIP GOVERNANCE

1. *Provide all correspondence where Welsh Government raised concerns about SSPC attendance.*
2. *Provide all actions Welsh Government required NWSSP or Velindre to take.*
3. *Provide all attendance monitoring reports held by Welsh Government.*

SECTION I — FAILURE TO ENSURE CLEAR ACCOUNTABILITY

1. *Provide all documents showing Welsh Government's assessment of accountability gaps.*
2. *Provide all correspondence relating to compliance disputes between NWSSP, Velindre, and Welsh Government.*
3. *Provide all internal analyses of accountability failures.*

SECTION J — COMPLETE CATCH-ALL

Provide any other recorded information held by Welsh Government relating to governance, accountability, hosting, identity, clinical governance, attendance, external scrutiny, service portfolio, or commissioning referenced in either document.

Our Response

We have concluded that some of the information requested is exempt from disclosure under Section 40(2) – Personal Information of the Freedom of Information Act. An explanation of our application of this exemption is set out at **Annex 1** of this letter.

Section A

1. Earlier this year the accountability arrangements for NHS bodies were reviewed. The oversight and accountability arrangements for NWSSP take place through quarterly meetings. The terms of reference for these meetings have been included along with this response (shared as Doc 1).
2. There has been no correspondence related to unclear oversight of NWSSP.
3. There haven't been any internal reviews into Welsh Government Governance of NWSSP.

Section B

1. There have been no planned or actual interventions related to NWSSP governance. The NWSSP Governance and Accountability Independent Review highlighted areas for strengthening. These are being addressed jointly by Welsh Government, NWSSP and Velindre through the delivery of the review recommendations but are not considered interventions.
2. There are longstanding escalations arrangements in place to be used where the Shared Services Committee and its member organisations (including Velindre) cannot come to a shared view or understanding. These are outlined under section 14 of the Memorandum of Cooperation which has been shared with this response. This document is currently under review. However, no changes are being proposed to this section. Furthermore, no escalation measures have been implemented.
3. There is no correspondence in which Welsh government identify risks that required Welsh Government intervention.

Section C

1. The three documents currently being reviewed by Welsh Government, in partnership with Velindre and NWSSP, are the Interface Agreement (shared as Doc 2), the Hosting Agreement (shared as Doc 3), and the Memorandum of Cooperation (shared as Doc 4). The review is expected to be completed before the end of the year. Copies of the current versions are attached.
2. Welsh Government has not undertaken any internal assessment to identify inconsistencies or areas where governance arrangements may be unclear.
3. The recommendations issued to Velindre and NWSSP are included in the published report this request relates to.

Section D

1. Welsh Government has not undertaken an assessment of NWSSP's clinical governance arrangements. This is because NWSSP does not provide clinical services; rather, it provides clinical support services. Both NWSSP and Velindre, as the host organisation and legal entity, have considered the nature of the services provided by NWSSP and concluded that they do not constitute clinical services.
2. Welsh Government has not raised concerns about clinical governance gaps.

3. The actions Welsh Government have asked to NWSSP and/or Velindre to take in relation to clinical services are outline in the independent review report and Welsh Government response. They are:

    - Recommendation 7: Welsh Government, the SSPC and its constituent bodies should satisfy themselves that appropriate clinical governance processes are in place including links to their own internal processes and Board assurance where relevant.
    - Recommendation 8: Velindre and the SSPC/NWSSP should satisfy themselves that the clinical governance processes of the SSPC/NWSSP are consistent with the clinical governance framework of Velindre as the host statutory organisation.

Section E

1. Welsh Government has not carried out an assessment of Velindre's hosting of NWSSP. This was undertaken as part of the independent review.
2. Welsh Government has not identified any hosting failures.
3. Section 20 of the Hosting Agreement sets out how the agreement can be amended, confirms its legal status and governing law, excludes third-party rights, and establishes a mechanism for reviewing and revising the agreement if it is found to adversely affect the ability of either organisation to carry out its core functions. Welsh Government does not hold any evidence, documents, or otherwise related to a decision to invoke section 20 of the Hosting agreement.

Section F

1. Welsh Government has not made an assessment, the Independent Review report suggested that external scrutiny be considered. Welsh Government responded to Recommendation 16 of the Independent review (shared as Doc 5).
2. There is no correspondence with Audit Wales regarding Audit gaps.
3. There is no record of internal discussions about the absence of standalone NWSSP accounts.

Section G

1. Welsh Government considered governance documents, SLA's and correspondence clarifying governance responsibilities for Infected Blood, TRAMS, International Recruitment, and Emergency planning as requested. We can confirm that the Welsh Government holds some information of this description. The following documents have been included:

Wales Infected Blood Support Scheme

- Memorandum of Understanding – available in the public domain: WITN4506035 - Memorandum of Understanding for the Management and Administration of the Wales Infected Blood Support Scheme between the Welsh Ministers and Velindre University National health Service Trust - 29 Apr 2021 | Infected Blood Inquiry

- Wales Infected Blood Support Scheme Governance Group Terms of Reference – available in the public domin: HSSG0000175 - WIBSS Governance Group Terms of Reference - 01 Mar 2020 | Infected Blood Inquiry

Transforming Access to Medicines (TrAMs)

- Welsh Government does not directly commission TrAMs, it is delivered by NWSSP on behalf of NHS bodies. Governance takes place through the Shared Services Partnership Committee. Therefore, Welsh Government does not issue governance related to documents or correspondence related to the delivery of this service.

International Recruitment

- Welsh Government does not directly commission International recruitment, it is delivered by NWSSP on behalf of NHS bodies. Governance takes place through the Shared Services Partnership Committee. Therefore, Welsh Government does not issue governance related to documents or correspondence related to the delivery of this service.

Emergency Planning

- Welsh Government does not commission NWSSP to deliver Emergency Planning.

Section H

1. Welsh Government has not raised concerns about SSPC Member attendance.
2. The required action is set out in the independent review report. It is:
    - Recommendation 10: All NHS bodies should review their participation in the SSPC and increase attendance at SSPC meetings to ensure effective governance including the representation of their organisations' interests at the SSPC and the provision of assurance to their Boards.
3. Welsh Government does not monitor attendance.

Section I

1. Welsh Government has not carried out an assessment of accountability gaps.
2. Section 19 of the Hosting Agreement sets out the process for disputes. This provision has not been invoked by either Velindre or NWSSP. Nor has Welsh Government raised a dispute with either organisation. Consequently, Welsh Government does not hold any correspondence or documentation relating to disputes under this provision involving NWSSP, Velindre and Welsh Government.
3. No internal analysis has been undertaken in relation to accountability failings.

Section J

The Welsh Government holds information that is captured by this part of your request. However, from my preliminary assessment I estimate that it will cost more than the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 to answer your requests.

The appropriate limit specified for central government is £600. This represents the estimated cost of it taking over 24 hours of time to determine whether we hold the information and to thereafter locate, retrieve and extract it.

We consider this part of the request to be broad in scope and could cover a vast period of files from 2012. Based on the headings provided, for our current file systems, we have identified approximately 5000 potential documents. Each document would need to be reviewed manually. To open and read the records would take at least 30 seconds for each one to determine if they are in scope. This would take 41 hrs and 40 mins.

Calculation:

Average number of Documents Located: approximately 5000 documents

Average time take to review document = 30 seconds X 5000 documents = approximately 41 hours and 40 minutes

Consequently, after considering the regulations and applying the timescales for review, I have decided not to provide you with the information you have requested.

You may wish to refine your requests by being more specific about what information you particularly wish to obtain and include any dates or period of time relevant to the information required. It may help you to refine any future requests if you were to consider which specific policy areas you want information on and include a specific period of time. You may wish to consider: *Are there any specific questions you want an answer to? Is there any specific piece of information you are looking for? What is it you want to understand?*

If you can identify what it is you are looking for, then ask for that information. By doing this, it would make it easier to identify what you are looking for and to provide a more focused response.

If you do refine your request in this way, this will be treated as a new request.

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 1

Section 40(2) – Personal Information 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

Your request relates to information about NHS Wales Shared Services Partnership Governance Review, and a number of documents are in scope of your request.

We have concluded that, in this instance, there is little to be gained from releasing the names of individuals and other personal data which are included within the attached documentation. We believe we have provided sufficient information to satisfy the legitimate

interest, and we do not believe disclosure of the identities of those consultants would allow any greater understanding

2. Is disclosure necessary?

Following the above analysis, we do not believe that disclosure of the personal data is necessary.

3. The balance between legitimate interests and the data subject's interests or fundamental rights and freedoms

As we do not believe disclosure of this personal data is necessary, there is no requirement on us to undertake a test to balance the legitimate interests against the right of individuals, as the fundamental rights and freedoms provided by the DPA are not being challenged.