04 November 2026

Dear

ATISN 27621 - NHS Wales Shared Services Partnership

Thank you for your request to Welsh Government for information under the Freedom of Information Act (2000) which was received on 7th October. You requested information held by the Welsh Government explaining how Welsh Government reconciled perceived contradictions in relation to:

1. Review of the NHS Wales Shared Services Partnership – Accountability and Governance Arrangements (July 2025)

2. Welsh Government Initial Response to the Review of NWSSP Governance (2025)

3. NHS Accountability and Support Framework (current GOV.WALES publication)

4. NHS Wales Performance Framework 2025–2026 (GOV.WALES publication)

5. Nick Wood – Accountability Interface Arrangements Letter (16 March 2026)

Your request asks for:

- "All recorded information explaining how Welsh Government reconciled..."
- Internal analyses
- Briefing notes
- Governance papers
- Risk assessments
- Mapping documents
- Decision records
- Actions taken
- Any other recorded information analysing or reconciling contradictions

Section 1 — Oversight Role vs "Lack of Clarity"
The 2025 NWSSP Review states:
"lack of clarity about the role of Welsh Government"
"further consideration is required"
"matters are not clear"
The NHS Accountability and Support Framework states:
"clear lines of accountability"
"defined oversight responsibilities"
"established escalation routes"

Under FOIA, please provide:

1. *All recorded information held by Welsh Government explaining how it reconciled the Review's finding of "lack of clarity" with the Framework's assertion of "clear lines of accountability."*

2. *Any internal analyses, briefing notes, or governance papers addressing this contradiction.*

3. *Any documents recording decisions or actions taken to resolve this inconsistency.*

Section 2 — Intervention Duties vs Existing Escalation Mechanisms The Welsh Government Initial Response states:
"Welsh Government will intervene"
"an appropriate mechanism for escalation is needed"

The Accountability and Support Framework already defines:
escalation routes
intervention powers
oversight duties

Under FOIA, please provide:

1. *All recorded information describing how Welsh Government assessed the need for "new" escalation mechanisms when such mechanisms already exist in the published Framework.*

2. *Any documents mapping intervention powers against the Framework's escalation model.*

3. *Any records of decisions concluding whether additional mechanisms were required.*

Section 3 — Hosting Arrangements vs Non-Use of Hosting Agreement Process The 2025 Review states:
"Hosting arrangements require clarification"
"the Hosting Agreement process was not used"

The Accountability Framework requires:
clear governance structures
defined hosting responsibilities
compliance with established processes

Under FOIA, please provide:

1. *All recorded information explaining how Welsh Government reconciled the Review's finding that the Hosting Agreement process was not used with the Framework's requirement for defined hosting governance.*

2. *Any documents assessing risks arising from non-use of the Hosting Agreement process.*

3. Any records of decisions or actions taken to address this governance gap.

Section 4 — Clinical Governance Gaps vs Performance Framework Requirements The 2025 Review identifies:
“clinical governance gaps”
“lack of assurance”
“unclear responsibilities”

The NHS Wales Performance Framework requires:
robust clinical governance
assurance mechanisms
defined accountability

Under FOIA, please provide:

1. *All recorded information held by Welsh Government explaining how it reconciled the Review’s findings of clinical governance gaps with the Performance Framework’s requirements.*

2. *Any internal assessments or risk analyses addressing this inconsistency.*

3. *Any documents recording decisions or actions taken to resolve these gaps.*

Section 5 — External Scrutiny vs Assurance Duties The 2025 Review states:
“external scrutiny is limited”
“assurance is insufficient”
The Accountability Framework requires:
assurance
scrutiny
oversight
escalation

Under FOIA, please provide:

1. *All recorded information explaining how Welsh Government reconciled the Review’s findings of limited external scrutiny with its own assurance duties under the Framework.*
2. *Any documents assessing whether assurance duties were being met.*

3. *Any records of decisions or actions taken to address assurance deficiencies.*

Section 6 — Directly Commissioned Services vs NWSSP Contractual Ability The 2025 Review states:
NWSSP has “limited contractual ability”
“directly commissioned services require clarity”
The Accountability Framework requires:
clear commissioning governance
defined contractual responsibilities

Under FOIA, please provide:

1. *All recorded information explaining how Welsh Government reconciled the Review's findings on NWSSP's limited contractual ability with commissioning governance requirements.*

2. *Any documents assessing risks arising from unclear commissioning arrangements.*

3. *Any records of decisions or actions taken to address these issues.*

Section 7 — General Reconciliation Records Under FOIA, please provide:

Any other recorded information held by Welsh Government that:

Analyses, reconciles, or explains contradictions between the 2025 NWSSP Review, the Welsh Government Initial Response, the NHS Accountability and Support Framework, the NHS Wales Performance Framework 2025–2026, and the Nick Wood Accountability Interface Letter; records decisions, risk assessments, or governance actions taken to address these contradictions.

Clarification
You provided clarification on 21 October and confirmed you:

I. seek recorded information which explicitly or implicitly analyses, discusses, evaluates, compares, reconciles, considers, records, assesses or otherwise addresses the apparent contradictions, inconsistencies, governance conflicts, accountability issues or differences identified between the specific documents listed within my request.
II. not seeking all information relating generally to the underlying governance topics. Rather, recorded information evidencing how Welsh Government understood, assessed, considered, reconciled, explained or addressed those matters when the identified documents are considered collectively.
III. not seek to impose an artificial date restriction. Searches should encompass any recorded information held by Welsh Government that falls within the scope of the request and which explains, analyses, considers, reconciles or otherwise addresses the matters identified, irrespective of the date on which such records were created.
IV. Section 7 is intended only to capture additional recorded information not already captured by Sections 1 to 6 and should not be interpreted as duplicating those sections.

Our Response

Section 1
1. The NWSSP Governance and Accountability Review was an independent review that considered a range of documentation and contributions from individuals interviewed as part of the review process. Based on the evidence available to the reviewer, it made 21 recommendations aimed at strengthening the governance

and accountability arrangements specific to NWSSP and its host organisation, Velindre University NHS Trust. The other documents you refer to set out the broader Welsh Government framework for governance, accountability and performance across NHS bodies in Wales. Welsh Government does not consider there to be any contradiction between the findings of the independent review and the wider governance framework, as they serve different purposes. The review reflects the assessment and conclusions of an independent reviewer based on the information available to him, whereas the other documents set out the governance and accountability framework that NHS organisations are expected to operate within.

Therefore, Welsh Government does not hold the information you have requested.

2. Welsh Government does not hold the information you have requested.

3. Welsh Government does not hold the information you have requested.

Section 2

1. The NWSSP Independent Review refers to escalation mechanisms that may be used where NWSSP and Velindre University NHS Trust are unable to reach agreement on matters relating to their hosting arrangements. The Accountability and Support Framework sets out escalation mechanisms relating to organisational performance, accountability and intervention across NHS Wales. These are separate matters that serve different purposes. Welsh Government has not undertaken any assessment to reconcile them, as it does not consider them to be contradictory. Therefore, Welsh Government does not hold the information requested.

2. Welsh Government does not hold the information you have requested.

3. Welsh Government does not hold the information you have requested.

Section 3

1. These are separate matters that serve different purposes. Welsh Government has not undertaken any assessment to reconcile them, as it does not consider them to be contradictory. Therefore, Welsh Government does not hold the information requested.

2. Welsh Government does not hold the information you have requested.

3. Welsh Government does not hold the information you have requested.

Section 4

1. These are separate matters that serve different purposes. Welsh Government has not undertaken any assessment to reconcile them, as it does not consider them to

be contradictory. Therefore, Welsh Government does not hold the information requested.

2. Welsh Government does not hold the information you have requested.

3. Welsh Government does not hold the information you have requested.

Section 5

1. These are separate matters that serve different purposes. Welsh Government has not undertaken any assessment to reconcile them, as it does not consider them to be contradictory. Therefore, Welsh Government does not hold the information requested.

2. Welsh Government does not hold the information you have requested.

3. Welsh Government does not hold the information you have requested.

Section 6

1. These are separate matters that serve different purposes. Welsh Government has not undertaken any assessment to reconcile them, as it does not consider them to be contradictory. Therefore, Welsh Government does not hold the information requested.

2. Welsh Government does not hold the information you have requested.

3. Welsh Government does not hold the information you have requested.

Section 7

Welsh Government does not hold the information you have requested.

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,