

A strategy for 2022-2025

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1. Background

In Wales we are fortunate to have wide-ranging support for an information sharing framework, the Wales Accord on the Sharing of Personal Information (WASPI). Welsh Government supports it, service providers own it, and the Information Commissioner recognises it as good practice.

Over the last 10 years, significant progress has been made in embedding WASPI across service providers in Wales. But there is more to do. Too often the ability to share personal information is (still) perceived as a barrier to collaborative and innovative service delivery.

WASPI has major role to play in improving culture and practice. The framework was the foundations of documented data sharing initiatives across significant partner organisations during the covid-19 pandemic, enabling organisations to share data with confidence. This strategy document outlines how WASPI intends to continue to make a difference and build on from the previous [2020-25 Strategy](#).

2. Vision, Mission, Aims and Objectives

Vision	Organisations will confidently, effectively, and lawfully share personal data, as necessary, for the benefit of people in Wales.
Mission	Helping service providers to deliver better services by promoting a standardised, consistent, and lawful approach to the sharing of personal data.
Aims	<p>Culture WASPI will drive a culture that supports the appropriate and lawful sharing of personal data to deliver effective services to people in Wales, providing a consistent approach for partners and supporting organisations to comply with the UK GDPR principles.</p> <p>Engagement All those involved in developing, managing, and implementing services will understand the purpose of WASPI and use it appropriately to support the effective sharing of personal data.</p> <p>Sustainability A flexible WASPI framework will be sustained, and further developed (i) through the continued promotion of its benefits to a wide range of stakeholders, (ii) by increasing the number of participating organisations and (iii) by identifying – and acting on – the needs of those stakeholders.</p>
Strategic Objectives	<ol style="list-style-type: none"> 1. Policy makers and decision takers, including Welsh Government, elected representatives, Chief Officers and Data Protection Officers will understand how WASPI helps them to demonstrate the principle of accountability introduced by data protection legislation. 2. Front line staff and managers will understand how WASPI can support them to deliver collaborative services. 3. Technology and digital solutions will be considered by DHCW to facilitate the development and quality assurance of agreements, management of reviews of agreements and for the sharing of good practice, support and guidance to stakeholders. 4. The WASPI team will support Data Protection Officers and Information Governance leads to confidently implement and promote WASPI as a framework to aid effective service delivery and achieve compliance with data protection legislation. 5. The WASPI governance structure will reflect the range of providers involved in the delivery of services in Wales.

6. WASPI will continue to be regularly reviewed to ensure it reflects the changes to the information sharing environment and provides a consistent national approach as an enabler to effective information sharing across Wales.
7. The WASPI framework will work towards introducing a formal Code of Conduct approved by the Information Commissioner for organisations to attain in addition to WASPI membership.

3. Values

Collaboration

From the development of agreements, to the identification of opportunities to promote WASPI, collaboration is key to a sustainable, lawful and effective information sharing framework.

Putting citizens first

The WASPI framework is for the benefit of people in Wales, helping them to receive better services and - through raising standards in information sharing - increasing their levels of trust in service providers.

Integrity and professionalism

Stakeholders act with integrity to build trust with colleagues and service users. They acknowledge and respect alternative viewpoints and interpretations as a key element of building a robust framework.

4. Context

WASPI is a well-established, cross-sectoral, information sharing framework. It aims to improve services delivered to people in Wales by helping service providers to share personal information lawfully and appropriately. By May 2022, over 700 organisations had signed the Accord and over 280 Information Sharing Protocols had been quality assured and published to the WASPI website¹, as examples of good practice.

The governance structure (Management Board, Quality Assurance Groups, WASPI support team) promotes and implements WASPI and ensures the framework remains relevant. Further information regarding the governance structure is available at Appendix A.

A refresh of the Accord, templates and guidance was undertaken between 2018 and 2021 which ensured WASPI reflected both the changes brought about by the updated data protection legislation, the updated ICO Data Sharing Code of Practice, and the feedback received from stakeholders. WASPI continues to receive support from Welsh Government and the Information

¹ www.waspi.org

Commissioner, who recognise it as good practice and a way in which service providers can comply with the Commissioner's Data Sharing Code of Practice.

WASPI played a vital role in the sharing of information between organisations that provide a public service during the COVID-19 pandemic. In addition to creating and sharing a COVID-19 Temporary Information Sharing Agreement template was established to enable organisations to document the sharing of personal data as part of the pandemic response, and a Joint Data Controller Agreement was created with the framework for the sharing of personal data necessary to deal with the COVID-19 outbreak for the purposes of implementing the Test, Trace, Protect strategy covering multiple organisations across Wales.



*Information Commissioner
August 2018*

'One of my key aims as Information Commissioner is to increase public trust and organisational confidence in sharing data. WASPI helps to ensure that organisations in Wales plan their data sharing carefully, and provide the necessary accountability and transparency to their service users that will help build that trust and confidence.'

'The further development of the Wales Accord on the Sharing of Personal Information (WASPI) has been driven by the changing legislative environment and feedback from those who use the framework. It continues to provide an established, recognised and robust good practice approach to information sharing which staff, citizens and all service partners can have confidence.'

*Julie James
Leader of the House and Chief Whip
August 2018*



5. The need for a strategy

Information sharing is a key factor in the delivery of effective services but there is more to do to educate and empower decision makers.

For example, **the 2018 Wales Audit Office report, 'The maturity of local government in use of data'²**, assessed whether local government has the right 'building blocks and culture in place to capitalise on the data that it holds.' Part two of the report considered local authorities' 'data protection work' and information sharing.

² <https://www.audit.wales/publication/maturity-local-government-use-data>

It found that while there had been ‘some progress in discussing the need to share data’, potential partners were often unwilling to participate because of concerns about complying with data protection legislation. The report found that operational managers / officers were also using WASPI as a barrier to information sharing, rather than an enabler.

The findings of the report support the need for further work to embed a culture where those individuals delivering services are supported to share information. WASPI is one enabling tool that can have a positive impact across sectors and service providers – a strategy will help focus energy and resources in the right places.

The importance of effective information sharing is further emphasised in legislation, strategy, and policy, including Welsh Government’s statement of intent, ‘Better use of health and care data for safe, effective care and efficient services’³, ‘Informed Health and Care, A Digital Health and Social Care Strategy for Wales’⁴, the Social Services and Wellbeing Act (Wales) 2014, The Wellbeing of Future Generations (Wales) Act 2015 and section 115 of the Crime and Disorder Act 1998. This is further recognised in Central Government’s consultation on “Data: a new direction”⁵ and intended Data Reform Bill. The WASPI Strategy will also aim to align to any updates to these legislation, guidance and initiatives including Welsh Government’s Data Promise.

6. Measurements, resources and funding

The success of this strategy will be measured by reference to outcomes (to the extent they are made available) reported in:

- Reports following routine audits of stakeholders by the ICO, where the scope includes information sharing / WASPI.
- Internal audit outcomes.
- Data Protection Officer assessments of compliance.
- Other relevant reports issued by Government, Audit Wales, regulators, inspectorate bodies or others.
- An annual assessment report measuring deliverables and outcomes

While it is anticipated that staffing levels of the core WASPI support team will remain at current levels, the ability to deliver strategic objectives may be subject to the identification of, and access to, additional funding. Specific delivery plans will factor in any business cases required to explore funding options.

The WASPI Management Board and five regional quality assurance groups remain central to the delivery of the strategy. Continued engagement from the current membership is crucial to the delivery of the agreed aims. Standard governance controls will be introduced to support the boards and ensure that they continue to run effectively and in line with consistent processes which will allow ease of transition in the event of WASPI becoming an approved Code of Conduct.

Digital Health and Care Wales (DHCW) is a Special Health Authority and statutory body established under statutory instrument 2020 No. 1451 (W.313), ‘The Digital Health and Care Wales (Establishment and Membership) Order 2020’. DHCW will continue to provide a support function for WASPI through its Information Governance team.

³ <https://gov.wales/sites/default/files/publications/2019-05/statement-of-intent.pdf>

⁴ <https://gov.wales/digital-health-and-social-care-strategy>

⁵ <https://www.gov.uk/government/consultations/data-a-new-direction>

This strategy will be reviewed annually by the WASPI Management Board with the next review scheduled for May 2023.

7. Suggested next steps and timescales

Timescale	Activity	Owner
June 2022	Consultation	WASPI Management Board
June 2022 onwards	Develop and implement plans to deliver agreed strategic objectives	WASPI team WASPI Management Board Wider stakeholder community
Annually	Review Strategy	WASPI Management Board

Appendix A – WASPI Governance

