

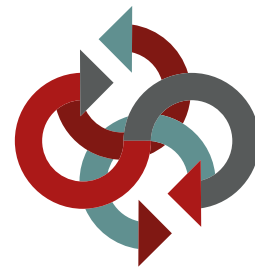


GIG
CYMRU
NHS
WALES

Iechyd a Gofal
Digidol Cymru
Digital Health
and Care Wales



Cefnogir gan
Lywodraeth Cymru
Supported by
Welsh Government



Cytundeb Rhannu Gwybodaeth
Bersonol Cymru
Wales Accord on the
Sharing of Personal Information



Code of Conduct Audit Strategy



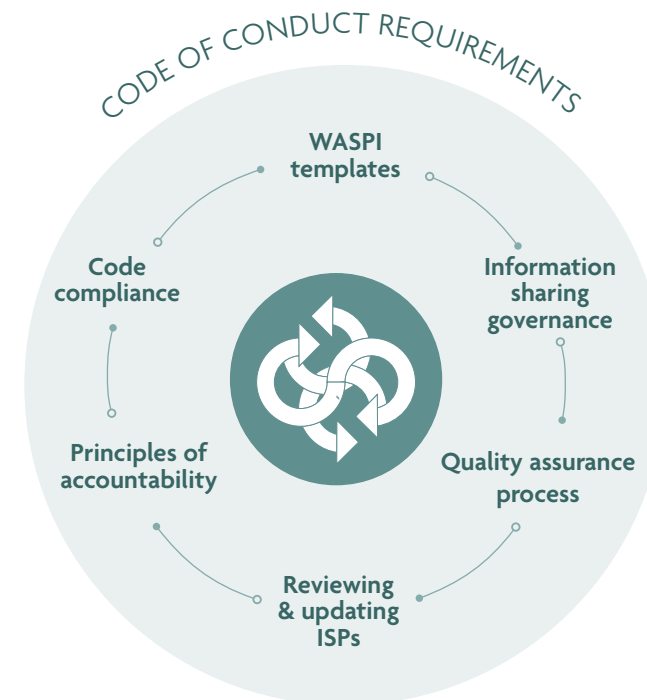
FOREWORD

The Wales Accord on the Sharing of Personal Information (WASPI) is a framework for organisations that provide services to the people of Wales, which helps these organisations share personal information effectively and lawfully.

Organisations who are WASPI Code members agree to adhere to the requirements set out in the WASPI Code of Conduct.

This Strategy focuses on the audit requirements set out within the Code of Conduct. The WASPI audits will provide independent and objective assurance to code members that their controls meet the expectations of the Wales Accord on the Sharing of Personal Information (WASPI) Code of Conduct and that assurance should cover the controls over core systems, governance and processes linked to the code.

The audit strategy plays a key role in supplementing the annual Governance & Information Risk Assurance, evidencing how controls set out are implemented within the code members organisation. Audits will be focused specifically on the Code of Conduct requirements below:



At the heart of this governance work is assurance on organisations controls over the quality of the information sharing practices, which form a key part of its responsibilities with compliance with the UK General Data Protection Regulation and Data Protection Act 2018.

In doing this work, the WASPI audit has the responsibility to act as the ‘independent Monitoring Body’ providing an independent view of where management of controls exist or could potentially be improved.

This document is intended to provide potential Code Members and other interested stakeholders an understanding of how audit forms part of the Code of Conduct. Further documentation will be produced to outline the audit process, including specific responsibilities of both the Code Member and the WASPI Monitoring Body.

WASPI Monitoring Body

WASPI Team, Digital Health & Care Wales



WASPI Code Owner

Digital Health & Care Wales



Strategic Intentions

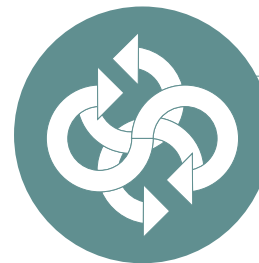
The Strategic intentions of the WASPI Audit Strategy are to:

- deliver audit services in accordance with the requirements of the WASPI Code of Conduct, bringing an enhanced assurance alongside the annual Governance & Information Risk Assurance (GIRA) processes,
- deliver a plan of assurance audit engagements, which demonstrate the added value and purpose to the Information Commissioners' Office on the application of the code and code member compliance,
- support code members with continued compliance with their code of conduct obligations, and
- set out clear intentions on the audit cycle and commitment of the monitoring body and code members.

Vision and Mission

Our purpose is to enhance and protect organisation value by providing risk based and objective assurance, advice, and insight.

We aim to be recognised as a leading provider of data sharing audit assurance services, based on achieving a high standard of professionalism and expertise in service delivery.



AELOD COD YMDDYGIAD
CODE OF CONDUCT MEMBER

Cytundeb Rhannu Gwybodaeth
Bersonol Cymru
Wales Accord on the
Sharing of Personal Information

The Audit Plan

A primary requirement of the Audit Strategy is to deliver a plan of assurance audit engagements, which are sufficient to publish as part of our annual reporting to the Information Commissioner's Office.

Our audit planning will align to the objectives and requirements of code membership and the annual Governance & Information Risk Assurance (GIRA) framework.

Each code member will be required to undertake an audit to demonstrate its compliance with the WASPI Code of Conduct on a three-year cycle. The audit cycle will be agreed with code members on an annual basis and published before 1st April of each year.

Code members will be responsible for ensuring that they engage with the monitoring body in a timely manner to ensure that the full audit programme can be agreed in advance of April each year.

The code member will be assigned a WASPI assurance auditor who will work with the code member through the audit process, as detailed within the audit process.

The monitoring body will provide the code member with the final assessment, findings and any outcomes and will follow up all audit recommendations within a timeframe to be agreed.

Audit Outcomes

Our purpose is to enhance and protect organisation value by providing risk based and objective assurance, advice, and insight.

We aim to be recognised as a leading provider of data sharing audit assurance services, based on achieving a high standard of professionalism and expertise in service delivery.

Audit Process

AUDIT CLOSURE/DECISION

An outline of the audit is shared with WASPI Management Advisory Board and part of the annual reporting to the ICO. A follow up is performed with the code member where applicable.

AUDIT REPORTING

The auditor prepares a report which details their findings. This is discussed with the WASPI Monitoring Body lead with the assessment, findings and any outcomes are provided to the code member.

AUDIT INTERVIEWS

Here the auditor gathers information via interview and gains understanding of the controls in place to meet standards. Auditors will identify strengths, weakness and opportunities for improvements.

AUDIT PLANNING

At this stage, the WASPI Monitoring Body develops and publishes the Audit Schedule for the next 12 month period.

ASSIGNMENT OF A WASPI ASSURANCE AUDITOR

The Monitoring Body will assign an auditor to work with and perform the audit of the code member identified.

AUDIT PREPARATION

At this stage the auditor will review GIRA returns, any past audits where applicable, and gathers any applicable documentation from the code member for a preliminary review.



Versions

Amended	Version	Status	Date	Purpose of change
D. Parsons	0.1	Draft	November 2022	Initial Draft

This document has been written and produced by:

WASPI Monitoring Body

Tŷ Glan-yr-Afon
21 Cowbridge Road East
Cardiff
CF11 9AD



This document is also available in Welsh