

STRATEGY 2025-2028



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



GIG
CYMRU
NHS
WALES

Iechyd a Gofal
Digidol Cymru
Digital Health
and Care Wales



Noddir gan
Lywodraeth Cymru
Sponsored by
Welsh Government

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BACKGROUND

In Wales we 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.

Since its inception, significant progress has been made in embedding WASPI across service providers in Wales. This strategy celebrates the 20th year since the WASPI framework was established and focuses on the ambitions to enhance and drive WASPI forward during the coming years. Too often the ability to share personal information is (still) perceived as a barrier to collaborative and innovative service delivery. The aims and objectives of WASPI is to support services with the foundations to effective personal data sharing activities.

WASPI has a 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, recognised through UK wide reviews of data sharing practices.

This strategy document outlines how WASPI intends to continue to make a difference and build on from the previous strategies. The importance of information sharing to the delivery of health, care and wider public services is well established. Without a continually developing WASPI framework, organisations will find it more difficult to demonstrate compliance with the law and good practice when sharing data.

Vision, Mission, Aims

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 and ensure that data sharing practices support the effective provision of services provided to citizens.
Aims	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.
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 required under data protection legislation. 2. Front line staff and managers will have the confidence to be able to share information appropriately, as a result of the WASPI framework and its message to support delivery of collaborative services. 3. Technology and digital solutions will be introduced to facilitate the development and quality assurance of agreements, management of reviews of agreements and create a national “single view” of all personal data sharing arrangements in Wales. 4. Establishing and maintaining a digital national register of information sharing activities allowing policy makers to focus on areas for improvements and reducing missed opportunities and enabling organisations to see all data sharing arrangements they are part of. 5. 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. 6. To continue to enhance and grow the WASPI framework, as it strives to become an approved ICO UK GDPR Code of Conduct with appropriate governance structures.

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.



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. Over 800 organisations have signed the Accord and over 300 Information Sharing Protocols had been quality assured and published to the WASPI website, as examples of good practice.

The governance structure (WASPI Management Advisory Group, 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.

Several refreshes of the Accord, templates and guidance have been undertaken over the years which have ensured WASPI continues to reflect 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 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.

In addition to supporting information sharing standards, WASPI also promotes data protection compliance, enabling organisations to comply with data processing and joint data controller arrangements. This is achieved through template agreements available for organisations across all sectors to utilise.

John Edwards, Information Commissioner, July 2025

As we increasingly explore the benefits that digitalisation, AI and data analytics can offer to users and providers of public services, it's worth reflecting that data protection remains as central to the success of initiatives using personal information as it was 20 years ago when WASPI began. As my predecessors have said, WASPI helps organisations delivering public services in Wales by providing a clear, shared process that guides them through the key steps to legislative compliance, as well as supporting the transparency and accountability that is fundamental to building and maintaining public trust and confidence in public sector use of data. Diolch yn fawr WASPI.

WASPI has been an invaluable part of our response to the Covid-19 pandemic and our Nation of Sanctuary response to the war in Ukraine, providing recognised good practice and flexibility which enabled us and our partners to respond at pace and with confidence that data was being shared appropriately and securely. WASPI will continue to assist us to meet our commitments under the Digital Strategy for Wales to ensure barriers to data sharing are removed, for the benefit of citizens."

Welsh Government, July 2025

1. www.waspi.gov.wales

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’ 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. 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 2024 ‘Social Care Data Maturity Assessment, National report for Wales’ found that barriers perceived by local authorities as most significant to effective data sharing were incompatible data systems, a lack of resources, the ability to quality assure the data being shared, and the complexities of navigating legal frameworks.

The findings of these report support the need for further work to continue 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 2023 ‘Institute for Government Report on Data sharing during coronavirus: lessons for government’ recognised WASPI as it “provides a common set of principles for the sharing of personal information, which greatly facilitated the Welsh government’s response during the pandemic. The framework reduces some of the imbalance in risk perception often associated with establishing new data sharing agreements, reducing any legislative barriers preventing data sharing.”

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’ , ‘Informed Health and Care, A Digital Health and Social Care Strategy for Wales’ , 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” and intended Data (Use and Access) Bill. The WASPI Strategy will also aim to align to any updates to these legislation, guidance and initiatives.

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

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.
- Achievements with Digital Health and Care Wales Integrated Medium Term Plan
- Internal audit outcomes.
- 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 Governance structure underpinned by the 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 continue to support the groups to 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 ICO 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 the function for WASPI through its Information Governance team with commitments reflected within the DHCW Integrated Medium Terms Plans.

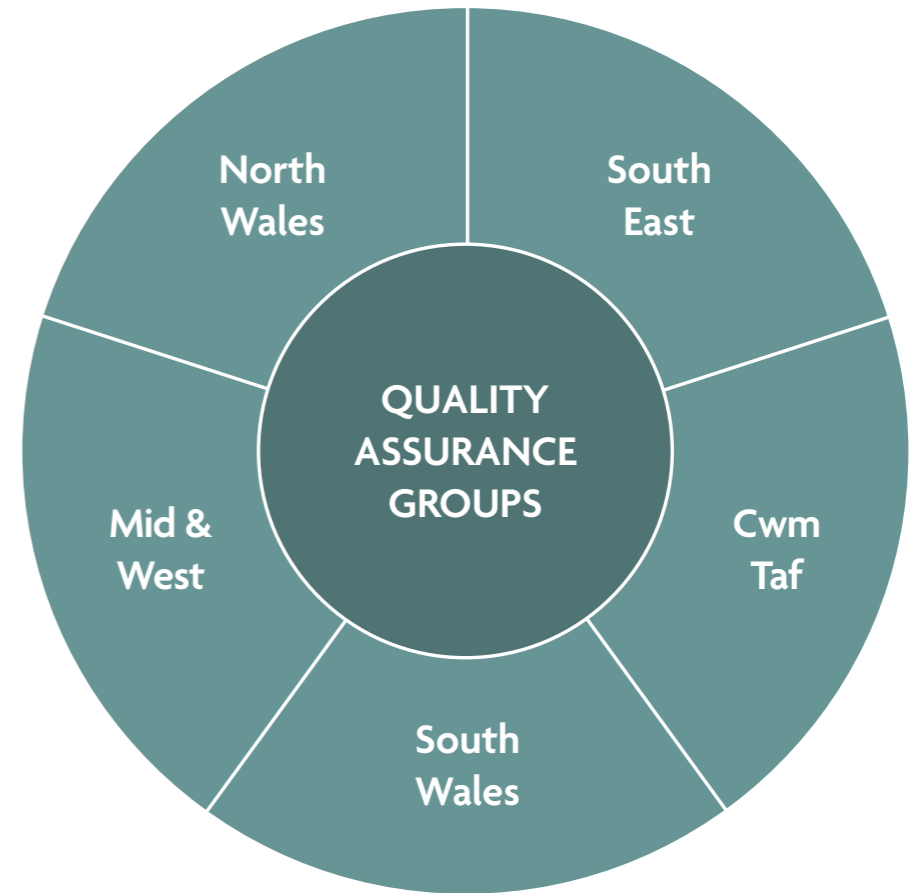

This strategy will be reviewed annually by the WASPI Team with the next review scheduled for January 2026.

3. https://insightcollective.socialcare.wales/assets/documents/Social-Care-Data-Maturity-Assessment_comp.pdfs
4. [Data sharing during coronavirus lessons for government_2.pdf \(instituteforgovernment.org.uk\)](https://www.instituteforgovernment.org.uk/sites/default/files/publications/2020-05/data-sharing-during-coronavirus-lessons-for-government-2.pdf)
5. <https://gov.wales/sites/default/files/publications/2019-05/statement-of-intent.pdf>
6. <https://gov.wales/digital-health-and-social-care-strategy>
7. <https://www.gov.uk/government/consultations/data-a-new-direction>

OUR PRIORITIES 2025-2028

Timescale	Activity	Owner
January-February 2025	Consultation	WASPI Management Board
March – April 2025	Publication of the Strategy and communications with stakeholders	WASPI team
April 2025 onwards	Develop and implement plans to deliver agreed strategic objectives	WASPI team
	Reconstitution of the current WASPI Management Board into a WASPI Management Advisory Group	WASPI Management Board
	Further review of our strategic objectives following submission of our proposed WASPI ICO Code of Conduct	
	Development of a digital platform to enable a single view of all WASPI Information Sharing Protocols across Wales, with ability for Protocols to be developed digitally between partners	Wider stakeholder community
Annually	Review Strategy	WASPI Team

APPENDIX A – WASPI GOVERNANCE

- Management Board
- Wales Information Governance Board (WIGB)
- Welsh Government



- 800+ signatories
- Local Information Governance
- ISP Development Process (400+)



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CONTACT US

For further information and advice view our website or contact us via email.

Website: www.waspi.org

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