



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



WASPI What's Next

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About WASPI

The Wales Accord on the Sharing of Personal Information (WASPI)¹ is an information sharing framework that has supported organisations directly concerned with the health, education, safety, crime prevention and social well-being of people in Wales for over 20 years².

¹ <https://www.waspi.gov.wales/>

² A copy of the WASPI Strategy for 2025-28 is available here: <https://www.waspi.gov.wales/news/waspi-strategy-2025-2028/>

Over 1000 organisations³ are committed to the principles and standards in the Accord, fostering information to be shared confidently, effectively and lawfully for the benefit of the people in Wales.

The award-winning framework⁴ provides template information sharing agreements for free on its website⁵. The framework is supported by all Welsh large public sector bodies who form regional Quality Assurance Groups⁶ to help to deliver better services by promoting a culture of collaboration.

About What's Next

In November 2025, the WASPI framework celebrated its 20th Anniversary⁷. The milestone allowed the WASPI Service and its partners to recognise the achievements made by the framework over the last two decades and those who have supported it⁸.

A key success of the longevity of the framework has been its ability to constantly evolve and update to meet the needs of its partner organisations. From the framework's initial launch in 2005, the establishment of the regional Quality Assurance groups in 2013, major review of the framework in 2018 and launch of new templates in 2024, it's clear that for WASPI to remain relevant, it needs to continually develop in a constantly changing complex legislative landscape.

Recent work such as progress on WASPI applying to become an Information Commissioner's Office (ICO) approved Code of Conduct under Article 40 of GDPR, development of a digital tool to develop and maintain information sharing agreements and a review of the framework templates to align with the changes made by the Data (Use & Access) Act 2025 (DUAA) demonstrate WASPI's continued commitment to change.

As a framework built by practitioners for practitioners, WASPI changes and adapts by continually asking for feedback from partners – such as changes and development of templates including Joint Controller Agreement and Data Processing Agreements and procurement of a digital tool which displays all Information Sharing Agreements an organisation is party to. WASPI developments come from feedback provided by partners over the years.

³ <https://www.waspi.gov.wales/news/1000-signatures-to-the-waspi-accord/>

⁴ [PICCASO Europe Privacy Team of the Year – Public Company 2025 & National Health and Social Care Strategic Information Governance Network Awards 'Information Sharing Champions' Award 2025](#)

⁵ <https://www.waspi.gov.wales/framework-documentation/templates-and-guidance/>

⁶ <https://www.waspi.gov.wales/good-practice/quality-assurance/>

⁷ <https://www.waspi.gov.wales/waspi-20-for-20/>

⁸ <https://www.waspi.gov.wales/news/celebrating-20-years-of-waspi-recognising-dedication-collaboration-and-champions-in-information-sharing/>

As part of WASPI's continuing commitment to seek the views of its partners, during the 20th Anniversary, we asked all partners to share their thoughts on "What's Next" – i.e. what were their views and ideas on what WASPI could look to achieve in the future to continue to support information governance compliance within their organisations and support an all Wales approach.

The results were received as part of an interactive stand in the breakout area of the 20th Anniversary event. Partners who were unable to attend were sent a survey following the event to be able to contribute, to ensure that we reached out to as wide of an audience of our partners as possible to help shape our future.

It is recognised that the WASPI Service have finite resources, and with the work already highlighted above taking presence, however the service wanted to garner partner thoughts with a view of considering what could be **undertaken, what is currently being achieved and future ambitions for the framework.**

The WASPI Service would like to thank all those who contributed to the "What's Next" feedback, and all those who have played a part in WASPI over the last 20 years.

Results

The feedback provided from the "What's Next" exercise has been grouped into six sections⁹. A full list of the feedback received can be read at Appendix A.

Templates

A key theme from partners related to templates, which is to be expected given broad use of the framework's templates across a range of organisations that support a variety of services.

Many suggestions were made by partners related to developing an all-Wales WASPI Data Protection Impact Assessment (DPIA) template. A DPIA is a process designed to help you systematically analyse, identify and minimise the data protection risks of a project or plan¹⁰. Whilst it is acknowledged that organisations will have their own DPIA templates, it is clear from the success of the information sharing templates, that an all-Wales WASPI branded DPIA template could help bring consistency across organisations and provide partners with assurances that their DPIAs undertaken contain all the relevant considerations. Further, WASPI has long encouraged

⁹ Acknowledging that comments could apply to more than one group.

¹⁰ <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/accountability-and-governance/data-protection-impact-assessments-dpias/what-is-a-dpia/>

organisations to complete DPIAs prior to developing Information Sharing Agreements¹¹ and providing a WASPI branded DPIA would allow organisations (particularly SMEs who may be less familiar with data protection requirements) to have all their templates required for information sharing in one place, which could improve and speed information sharing. Whilst it is appreciated that it could be a challenge to create one DPIA template to suit all organisations, the lessons learnt from the temporary Covid Information Sharing Agreement showed that flexibility in a WASPI template can be achieved¹².

Other new templates suggested included development of an all-Wales WASPI template for privacy notices. Under data protection legislation, individuals have the right to be informed about the collection and use of their personal data¹³. This is part of the “Right to be Informed” and an important part of this requirement is having privacy information/notices. WASPI templates, particularly the Information Sharing Protocol, ask organisations to outline how they inform individuals about how they will process individuals’ personal information and these are commonly appended or embedded into the template. Having standard WASPI templates for organisations to use could speed information sharing and help create consistency and clarity to individuals about how their information is being used.

Training, Networking & Events

WASPI continually receives requests to provide training, and feedback from the events WASPI host or exhibit at are always positively received. Therefore, it is not unexpected that training, networking and events is a key theme from the “What’s Next” feedback.

Feedback¹⁴ suggests the benefits of in person events, providing a network of partners who can devote dedicated time away from the pressures of their role to focus on information sharing and data protection.

Partners also suggested training, with thought could be given to how this could also be achieved virtually, including e-learning or videos¹⁵.

¹¹ As referenced as part of guidance on information sharing agreements and most notably, as part of the “Pre Quality Assurance Checklist” that prefaces the Information Sharing Protocol, asking “Has a DPIA been completed in consultation with your Information Governance lead”.

¹² Feedback on the use of the WASPI Temporary Covid Agreement directly led into the new templates provided in 2024, which are now being used by organisations across Wales - <https://www.waspi.gov.wales/news/new-waspi-templates-for-joint-data-controller-arrangements-and-data-processing-arrangements/>

¹³ <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/the-right-to-be-informed/>

¹⁴ From “What’s Next” and feedback following a survey to attendees of the WASPI 20th Anniversary Event.

¹⁵ Two WASPI videos for partners new to the framework can be found here: <https://www.waspi.gov.wales/news/waspi-training-videos-now-available/>

Training and support for the digital tool, the Information Sharing Gateway (ISG) was also highlighted, with this already scheduled as part of implementation and roll out.

Specific training for different sectors (NHS, Schools, charities, GMPs, CPs) was also raised.

Regulatory inspections

Comments made by partners also highlighted the call for the WASPI framework to be embedded as part of existing regulatory inspections. Acknowledging that WASPI has previously worked with the ICO to be referenced during audits of Welsh organisations. It is also noted how including WASPI as part of inspections will bring greater benefits as part of the WASPI Code of Conduct.

Suggested approaches included working with schools, Audit Wales, Care Inspectorate Wales and healthcare bodies to ensure that the framework is used as the standard by which organisations should be measured against for information sharing practices and compliance. Noting the wider engagement work that will be required to support organisations using the framework to aid their information sharing activities.

Improvements to existing process

WASPI works on a continuous improvement model, with regional Quality Assurance groups and a Management Board able to raise concerns, risks and suggested improvements. Naturally, the feedback in “What’s Next” enabled partners to raise further improvements that they think could benefit the framework and information sharing between partners.

The need to update the website was raised, which the WASPI Service have already identified and begun work on. The need for the website to be refreshed is noted particularly given the growth of the framework with the Code of Conduct and digital tool (the ISG).

Improved attendance at some Regional Quality Assurance groups was highlighted, with opportunities to build upon the success of an engagement event in North Wales in May 2025, which led to a renewed membership.

Other feedback highlighted case studies and heat maps, which could be developed. These had been developed previously, but require partners input to develop. It is noted the ability the ISG tool will bring in displaying on a map an organisations information sharing flows.

Clarity around legislative requirements

With data protection being a constantly changing complex legislative landscape, it is to be expected that partners have highlighted the need for support, particularly around legal basis for processing.

Partners have raised challenges with legal powers and legislations to aid information sharing but with such a range of organisations, it's unclear how WASPI can understand legislations across all sectors, above and beyond what is undertaken through the Quality Assurance process. Further, Information Sharing Protocols that have been through the Quality Assurance process are published as examples of good practice by the WASPI Service. This allows organisations to look at existing agreements and see what legislation is being relied on and replicate this for their own area. WASPI currently provides clear templates setting out legal basis (including for Law Enforcement Purposes), so it is unclear, other than the points raised elsewhere in this report, what WASPI can support on this further.

Existing future work

As part of the feedback, partners also raised a number of views which the WASPI Service are currently undertaking.

Feedback included approval and implementing the ICO approved Code of Conduct, roll out of the ISG to digitise the information sharing templates and updating existing templates to align with DUAA. This work is already being taken forward by the WASPI Service.

Recommendations

Whilst some of this work is already being undertaken, some of the recommendations will require work to understand, plan and implement. It is also noted that some of the work the WASPI Service is unable to deliver at present can be reviewed in the future.

The WASPI Service will provide a briefing to Welsh Government to supplement this report with a view to any recommendations being explored fully between the WASPI Service and Welsh Government.

This report has highlighted key recommendations from this report which could be delivered with the right resource, support and input from partners, alongside actions the WASPI Service are currently taking forward in these areas:

Group	What we are doing	What we could do	Challenges
<p>Templates</p>	<p>Updating templates and guidance to Version 6, taking into account changes from DUAA.</p> <p>Consulting on changes with partners.</p>	<p>Template DPIA and Privacy Notices could help create consistency through a standardised approach and enable organisations to use WASPI as a “one shop stop” for all things information sharing, which in turn could improve, speed and enable information sharing.</p> <p>The DPIA template could be made available digitally through the ISG with flexibility to allow organisations to add sector specific considerations into the template.</p>	<p>The WASPI Service has a limited set of resources to deliver the current services provided.</p> <p>Input from partners.</p> <p>External legal input required to support developments.</p> <p>Developing a new set of templates, around DPIAs and privacy notices would require extensive considerations as WASPI templates are designed to support all organisations in Wales. This would likely be a challenging and resource intense exercise.</p>
<p>Training, Networking and Events</p>	<p>Undertaking a roll out of the ISG, working closely with partners to ensure organisations are supported and trained to get the fully realised benefits from the system. The WASPI Service have developed plans including events, using the existing Regional Quality Assurance groups to support this.</p>	<p>Beyond roll out of the ISG, continue with WASPI as a network for information sharing professionals. It is recognised that the strength of WASPI comes from the culture of collaboration, which greatly benefited initiatives such as the Nation of Sanctuary and the Test, Trace, Protect programmes. To fully realise benefits of information sharing opportunities to enable networking and training could be explored further.</p>	<p>The WASPI Service has a limited set of resources to deliver the current services provided.</p> <p>Support from organisations to allow their staff time to attend.</p> <p>The WASPI Service has a limited budget, so multiple events on an annual basis are something which could not be provided without additional funding to support.</p>

		<p>The WASPI Service could consider working alongside partners such as Welsh Government, to identify focused areas of data sharing through ministerial portfolios. This would enable a clear focus on data sharing standards aligned to Welsh Government policy.</p> <p>The WASPI Service could consider the development of an e-learning model to support data sharing and the WASPI framework which could be made available on e-learning platforms for organisations across public services to potentially deploy within their organisations.</p>	
<p>Regulatory Inspections</p>	<p>Working with a pilot area of schools within local authorities initially to engage and sign them up to the Accord, given the significant amount of sensitive information sharing they are involved in.</p> <p>Following this to engage with all remaining schools across Wales and liaising with policy leads in Welsh Government to support data sharing standards.</p>	<p>Continuing to work with local authorities to make sure schools are signed up to the framework.</p> <p>Work collaboratively with regulators and to include WASPI as part of future inspections.</p> <p>Provide further guidance and tools to allow organisations to have greater understanding of information sharing requirements.</p>	<p>The WASPI Service has a limited set of resources to deliver the current services.</p> <p>Input from regulators.</p> <p>Organisational commitment to WASPI</p>

	Promoting and contributing to ICO's guidance on safeguarding. ¹⁶		
Improvements to Existing Processes	<p>Refreshing the WASPI brand, including graphics and documentation on website.</p> <p>Digitising and automating registration process.</p> <p>Refreshing partner organisations listed on website.</p> <p>Developing and releasing an Information Sharing Protocol register which displays all ISPs an organisation is signed up to.</p>	<p>Dedicated sections of the website clearly displayed for the WASPI Accord (and templates), Code of Conduct and ISG.</p> <p>Considering a rebrand of WASPI, including the website re-design to aid accessibility.</p> <p>Further videos, e-learning and materials to support organisations share information.</p>	The WASPI Service has a limited set of resources to deliver the current services.

¹⁶ <https://www.waspi.gov.wales/news/new-ico-guidance-sharing-data-to-safeguard-children/>

Appendix A – Full “What’s Next” feedback

A full list of all feedback is provided below. Repeated references are retained.

- A set of principles to help guide the responsible adoption of machine supported decision making (AI)
- Additional framework docs and context – DPIA to accompany ISP
- Agreed application of legal powers
- Approve the WASPI Code of Conduct
- Assurance around orgs signing up to WASPI – agreeing to share info but security not adequate
- Case studies of improved sharing using WASPI which we can use internally to raise awareness amongst front line staff
- Clarity around requirement for DPIA taking into account duplication with the ISP template
- Clarity of all re: local awareness & compliance – who has been notified within org e.g. checklist
- Deliver revised training to the IG community to help them develop ISPs
- Develop application focus based on sharing
- DPIA template
- DPIA template
- DPIA templates
- Early engagement around hard “no” to save time
- Electronic DPIA process/template
- European Union?
- Forum / network for practitioner
- Getting approval for a monitoring body for the code of conduct
- Good idea to sign up schools but they need to understand what it means
- Greater attendance at WASPI QA boards
- Heatmaps of existing agreements across Wales to highlight gaps
- How do we tackle data sharing with GPs and other sectors regionally and nationally?
- In person training events
- Include IG as part of CIW inspections
- Inclusive and easy to understand learning across orgs “action learning sets” being orgs together across different sectors to discuss and challenge specific approaches to data sharing as an enabler
- Incorporating Data ethics assessments
- Interactive town hall sessions

- Investment in training for practitioners who get blanket IG training that has a prohibitive not permissive message. This can impact on delivering safe and effective healthcare and embedding WASPI/ improve culture
- ISG training
- ISG training
- Making templates electronic
- Materials to help practitioners understand what WASPI is – brief and to the point
- More in-depth training and understanding
- More networking events! Good day – re-connecting
- National DPIA template
- National DPIA template with flexibility
- Online training for facilitators / subject matter experts
- Privacy notice icon library – for accessibility
- Privacy notice templates
- Re-brand website
- Re-brand website
- Roll out the ISG to everyone!
- Separation of the conditions and powers so it is clear what applies to who
- Share legislations to partners to aid data sharing
- Short video “What is WASPI” for circulation to internal staff
- Support for implementing AI solutions
- Support for small organisations – charities, GMPs, CPs etc
- Supporting organisations in implementing the ICO-approved Code of Practice
- Template privacy notices
- Templates are great – would benefit from 2 way DDA
- Thinking about how AI can enable greater data sharing whilst avoiding the risks
- Training for facilitators
- Training for NHS staff in post and those in training about public task
- Training tools
- Updated DPA needed with DUAA and reciprocal clauses
- Working with registration bodies to standardise guidance for staff (GMC, MNC, BACP)

