

Digital transformation

Welsh Ambulance Services University NHS
Trust

September 2026



About us

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Audit snapshot

What we looked at

- 1 We looked at how the Welsh Ambulance Services University NHS Trust's (the Trust) approach to digital transformation is supporting service improvement. This included its approach to strategy, leadership and skills development. And we considered how the organisation manages risks around digital infrastructure, cyber resilience and artificial intelligence (AI).

Why this is important

- 2 Digital technology is a key enabler to many of the aims of A Healthier Wales. That plan says that new technologies and digital approaches will be an important part of the future whole system approach to health and care.
- 3 However, achieving digital transformation is challenging. It requires investment, the right infrastructure, and staff engagement and training. Systems need to communicate with one another, and organisations must manage ever-growing risks around cyber resilience.
- 4 Digital transformation isn't just about technology, it's about culture and leadership. The boards of NHS bodies have a key role in approving and owning the organisation's digital strategy. Boards also need assurance that digital transformation is being managed safely and effectively, and that investment is securing the intended benefits.

What we have found

- 5 The Trust has clear digital ambitions and strong leadership. Its Digital Plan aligns with national priorities, but does not set out clear milestones, ownership, or resource needs. It lacks a clear view of digital maturity. This, together with some weaknesses in reporting, makes it hard to track progress.
- 6 The Trust regularly reviews its strategic digital risks and has a range of cyber resilience controls. But longer-term planning around digital infrastructure and governance for AI is not clear enough to provide full assurance.
- 7 The Trust recognises the importance of digital skills and capacity, but its approach is not yet joined up. Skills are not assessed consistently, training is fragmented, and workforce planning is not based on a clear baseline.
- 8 The Trust recognises the importance of engagement and involvement. Staff and service users are involved in some projects, but this is not consistent across all digital developments. Although the Trust is committed to reducing digital exclusion, it does not have a clear plan or a dedicated lead to drive this work.
- 9 The Trust is delivering digital projects and working with national partners. But it does not have a clear, joined-up view of progress, risks, or benefits. Future plans for digital investment and evaluation are unclear, which limits assurance that digital work will deliver lasting value.

What we recommend

- 10 We have made nine recommendations to the Trust. These focus on:
 - Strengthening the Digital Plan with clear milestones, ownership, resource needs, and success measures.
 - Improving reporting to the Board, including clearer progress measures and risk updates.
 - Strengthening Board oversight of digital transformation risks.

- Developing a costed digital infrastructure replacement plan with clear timelines and long-term investment needs.
- Introducing a clear AI strategy and governance framework.
- Building digital workforce capability through better skills assessment and training.
- Strengthening user engagement and digital inclusion.
- Setting out clear, costed investment plans beyond 2025-26.
- Introducing consistent post-implementation reviews to assess value.

Key facts and figures

Between 2021-22 and 2024-25, the Trust invested around £58.1 million in digital revenue and £16.9 million in digital capital.

Of the Trust's 4,400 staff, only 22 have completed the Health Education and Improvement Wales (HEIW) Digital Capability Framework self-assessment.

The Trust has not completed a Health Information and Management Systems Society (HIMSS) Electronic Medical Record Adoption Model (EMRAM) assessment or Infrastructure and Adoption Model (INFRAM) assessment.

In 2025-26, the Trust reported no cyber incidents under the Network and Information Systems Regulations 2018.

Our findings

Strategy, planning, and leadership

The Trust shows clear digital ambitions and strong leadership, but gaps in planning, baseline measures, and reporting limit its ability to track progress and outcomes

Digital strategy and plans

- 11 The Board approved the Trust's Digital Plan - 'Our Digital Plan' - in July 2024. The plan outlines the Trust's aim of using simple, reliable digital technology and data to improve services and deliver high-quality care. To deliver this vision, the Trust has set out five key digital and data pillars¹ in the plan, one of which is 'transformation'. The plan aligns with national priorities, the Trust's long-term strategy and vision, and its Integrated Medium-Term Plan (IMTP) 2025-28. The Trust says that stakeholders were involved in developing the plan. But the plan does not clearly show who was involved or how their feedback shaped the Trust's digital priorities.
- 12 The plan reflects the Trust's view of its digital strengths and weaknesses, drawing on internal and external reviews and some benchmarking. It also describes the Digital Directorate in detail, including its structure, ways of working, and key areas for improvement. But the plan does not include a formal digital maturity assessment or set a clear baseline for the Trust. This makes it hard to track progress, demonstrate impact, and compare performance with other organisations.

¹ Its five digital and data key pillars are: (1) Everyday Essentials, (2) Security, Safety and Cyber, (3) Digital Pioneers, (4) Transformation, and (5) Data, Information and Insight.

- 13 The Trust's digital priorities are set out in the Digital and Data Roadmap within its IMTP 2025-28. The roadmap gives a clear picture of what the Trust aims to deliver in year one but provides less detail for years two and three. Also, it does not clearly assign ownership, resource needs, or how success will be measured. This makes it hard to understand how delivery will be managed and progress assessed.

Board ownership of digital transformation

- 14 The Board understands and supports the Digital Plan. Senior leaders also recognise the importance of digital for the Trust's long-term strategy. Digital issues are discussed regularly by the relevant committees (see **paragraph 17**). Board members have taken part in training on some areas, such as cyber security. More training is planned on areas such as AI and data. This helps the Board provide challenge and oversight. But more regular training would help Board members provide consistent leadership and challenge on digital matters.
- 15 The Chair of the Finance and Performance Committee is the Trust's Board-level Champion for Digital. This helps maintain the profile of digital at Board. The Chair also represents the Trust on the All-Wales Independent Member Digital Network. The Director of Digital Services represents the Trust on the All-Wales Directors of Digital forum. These groups provide useful opportunities to share learning and take part in national digital discussions that inform the Trust's digital change work.

Roles, responsibilities and accountability

- 16 The Trust has strong digital leadership and clear roles. The Director of Digital Services leads the Digital Plan and assistant directors lead day-to-day work.

- 17 The Board has a reasonable understanding of progress in digital work. Updates are provided every two months to the Finance and Performance Committee, with key issues raised at Board meetings through highlight reports. But these updates do not always include key information, such as progress against milestones, changes in risk, or if programmes are on track. Coverage is also uneven, with some areas reported in detail and others only briefly described. This makes it hard to see overall progress across the Digital Plan. Reports also tend to focus on activity rather than outcomes, and the link to strategic priorities is not always clear. More consistent reporting, clearer measures, and the use of simple visuals would help the Board monitor delivery more effectively.
- 18 Digital reports provide detailed updates on a wide range of programmes and activities, but the language is often technical. Specialist terms and system names are used, with limited explanation of what they mean or why they matter. This can make it hard for some committee members to quickly understand progress, identify emerging issues, and focus on the most important risks. Our observations of meetings found that discussions on digital matters are brief, with limited questioning and challenge. This suggests that the complexity of the reports may be limiting effective scrutiny.

Identifying and managing risks

The Trust regularly reviews its strategic digital risks and has a range of cyber resilience controls, but gaps remain in infrastructure planning and AI governance

Strategic digital risks

- 19 The Trust's Board Assurance Framework (BAF) includes two digital strategic risks: the unauthorised or inappropriate use of AI, and a major cyber-attack that could disrupt systems and services. Both risks are rated high, with scores of 16 and 20 in that order. The Board and Finance and Performance Committee review them regularly.
- 20 Reports list controls, track actions, and include some progress measures. But they do not clearly show how well controls are working or how actions are reducing risk. Clearer reporting on their effectiveness would strengthen Board oversight.
- 21 The BAF does not include a specific risk on digital transformation. This means the Trust may not fully consider risks that could affect delivery of its Digital Plan, such as delays or limited resources. As a result, the Board may find it hard to make informed decisions, target resources, and demonstrate clear management of strategic digital risks.

Digital infrastructure risks

- 22 The Digital Plan focuses on making sure the Trust's digital infrastructure is reliable and supports day-to-day services. It highlights the need for dependable systems, devices, and core technology to help staff do their jobs effectively and make sure patients can rely on digital services. But it does not explain how or when digital infrastructure will be upgraded.

- 23 The Trust is making progress in updating infrastructure in some areas. It is replacing high-risk systems, installing new servers for critical services, and moving some systems to the cloud. These actions show that the Trust responds when risks are identified. But most of this work is managed through separate projects, often linked to available funding. There is no single view of key gaps across the digital estate or a long-term funded plan for replacing outdated or unsupported systems. This makes it hard to assure the Board that infrastructure risks are managed in line with long-term goals.

Cyber resilience

- 24 The Trust has a Cyber Improvement Plan, which brings together actions from different reviews including Network and Information Systems (NIS) directive audits. Most high-risk actions are complete or now part of business as usual. At the time of our review, the Trust was updating the plan to better reflect operational and clinical impact.
- 25 The Trust provides cyber reports every two months to the Finance and Performance Committee. These reports cover cyber incidents and day-to-day issues. The March 2026 report notes a small number of incidents, including one involving a third-party supplier. The incident was found and resolved quickly using existing processes. However, the reports use technical language and limited use of plain English. This may make them harder for non-specialist Board members to fully understand the information.
- 26 The Trust uses a range of controls to improve cyber resilience. These include system updates, vulnerability checks, and testing recovery plans for critical systems such as 999 and 111. Cyber risks are also considered when new systems are introduced. These actions have reduced some risks, such as improving device security and reducing unused accounts. But some issues remain. Reports highlight weaknesses during busy periods, ongoing phishing attacks, and low take-up of cyber training. These issues reduce the overall effectiveness of controls.

Artificial intelligence

- 27 The Trust recognises that AI offers benefits, but its current use is limited. The Trust mainly uses AI to support staff with administrative tasks and data analysis. It is not used to support clinical decision-making. The Trust does not yet have a clear strategy setting out how it will use AI to improve efficiency and effectiveness and support change and innovation.
- 28 Positively, the Trust has recorded an AI risk in its BAF (see **paragraph 19**). The risk covers the data protection, legal, and reputational issues that could arise from AI use. The Trust is mitigating the risk through guidance, monitoring, and an AI Steering Group. But as use of AI grows, the Trust will need stronger governance to manage clinical, operational, and ethical risks.

Digital skills

The Trust recognises the importance of digital skills and capacity, but stronger assessment, training, and workforce planning are needed to support digital transformation

Assessing digital skills

- 29 The Trust recognises the importance of digital skills but does not assess them in a consistent or comprehensive way. Only 22 staff have completed the HEIW Digital Capability Framework self-assessment. This is low for an organisation of around 4,400 staff. The framework focuses mainly on basic IT confidence and does not cover the wider skills needed for digital transformation. There is no evidence that the Trust assesses these broader skills in other ways. As a result, it does not have a clear picture of its overall digital capability. This makes it hard to target training, allocate resources, and plan digital change.

Developing digital skills

- 30 The Trust wants to develop a digitally skilled workforce but does not yet have a clear, joined-up training programme. The Digital Plan and Strategic Workforce Plan both recognise the importance of digital skills and set an ambition for a digitally capable workforce. The Strategic Workforce Plan also commits to developing a Digital Skills Strategy for 2025–2030. But there is limited detail on what this strategy will include, how skills will be assessed, how gaps will be identified, or how training will be targeted and measured.
- 31 The Trust provides access to learning tools such as online courses, e-learning, and training linked to new systems. But these are not yet brought together into a single structured programme. As a result, the Trust cannot be confident that its approach will provide the skills needed to support digital transformation effectively.

- 32 At the time of our work, the Trust had 109.22 whole-time equivalent staff in digital roles. The Trust was also strengthening its Digital Directorate by recruiting a Head of Business Change and Benefits. The Digital Plan recognises the importance of having the right skills and capacity in the Digital Directorate. But it does not set out a clear baseline of digital skills and capacity. This makes it hard to assess if current staffing levels are sufficient to meet the Trust's digital needs.

Collaboration and involvement

The Trust recognises the importance of engagement and digital inclusion, but gaps in approach, leadership, and delivery limit the impact on digital transformation

Staff and service user involvement

- 33 The Trust involves staff, patients, and service users in some digital work and has received positive feedback from specific projects. It is also introducing new approaches, such as the Innovation Lab and the Digital Transformation and Innovation Programme Board. While this is positive, the Trust does not yet have a single clear approach to involving stakeholders and using their feedback to shape its digital priorities.

Reducing digital exclusion

- 34 The Trust's Digital Plan aims to prevent digital exclusion and make sure its digital services meet the needs of people with different levels of digital access and confidence. Its strong emphasis on user-friendly design and reducing barriers to access shows the Trust's commitment to improving digital inclusion.
- 35 But there is limited evidence of digital exclusion being reduced in practice. The Trust does not yet have a clear digital inclusion plan that sets out its aims, actions, or how success will be measured. Also, there is no dedicated lead for this work. The Trust is exploring how to strengthen this area, including improving reporting to the Digital Transformation and Innovation Programme Board and the Board.

Using digital developments to support service transformation

The Trust is delivering digital improvements, but gaps in planning, funding clarity, partnership working, and evaluation make it hard to show long-term impact and value

Investment in digital transformation

- 36 The Digital Plan sets out why digital investment matters and what the Trust aims to achieve. The IMTP 2025-28 shows how this supports the Trust's wider strategy. A separate paper to the Finance and Performance Committee included high-level cost options. But these documents do not clearly show the full cost of delivering the Digital Plan over time. They also do not explain how funding links to priorities or how delivery will be funded beyond these high-level figures.
- 37 **Exhibits 1 and 2** show that the Trust has invested significantly in digital in some years, but spending has varied between years. Between 2021-22 and 2023-24, capital investment ranged from £4.2 million to £6.6 million. In 2024-25, capital spending fell sharply to £1.6 million, suggesting fewer large projects were funded. Revenue spending increased steadily during the same period, rising from £10.5 million in 2021-22 to £15.5 million in 2024-25. This suggests an increased focus on running, maintaining and supporting existing digital systems.
- 38 The Trust has set out planned digital spending for 2025-26, with £2.2 million for capital and £17.3 million for revenue. However, it has not provided capital figures for 2026-27 or 2027-28 and has shared little information on revenue funding beyond 2025-26. This makes it difficult to assess if the Trust will have enough funding in future years to maintain existing systems or deliver its planned digital improvements.

Exhibit 1: Annual capital and revenue investment in digital (2021-22 to 2024-25)

Financial year	Capital (£m)	Revenue (£m)
2021-22	4.5	10.5
2022-23	4.2	12.6
2023-24	6.6	13.2
2024-25	1.6	15.5

Source: Trust supplied data

Exhibit 2: Planned levels of capital and revenue investment in digital (2025-26 to 2027-28)

Financial year	Capital (£m)	Revenue (£m)
2025-26	2.2	17.3
2026-27	-	-
2027-28	-	-

Source: Trust supplied data

Local and regional digital projects

39 The Trust is delivering a range of local digital and data projects to improve services, support staff, and increase efficiency. These include:

- improving NHS 111 by introducing new features such as online symptom checkers and virtual assistants;
- upgrading dispatch and control room systems;
- refreshing the electronic Patient Care Record (ePCR);

- updating cloud-based rostering and timesheets; and
- improving the use of data and performance reporting.

40 The Trust is also testing simple AI tools, mainly to support staff rather than clinical decision-making (see **paragraph 27**).

Adopting national digital systems

- 41 The Trust works with national and system partners to support delivery of its Digital Plan. It engages with the Welsh Government, Digital Health and Care Wales (DHCW), and national clinical groups and programmes on areas such as NHS 111, emergency response, and performance reporting. It also takes part in national digital programmes and data sharing, showing a commitment to the 'Once for Wales'.
- 42 Joint working with partners is stronger at a project level than at a strategic level. Reports describe many partner-led or partner-supported projects, but do not always clearly show roles and responsibilities, how partner delivery is overseen, or how partner risks are managed.
- 43 The Trust is beginning to improve its partnership governance arrangements. But it needs to do more to improve oversight of partner-led digital work and make better use of national digital expertise. This includes clearer responsibilities for partners, closer working with HEIW on digital skills, and providing more structured feedback to DHCW and the Welsh Government on national programmes and initiatives.

Evaluating digital solutions

- 44 The Trust does not yet have a clear or consistent approach to reviewing projects after delivery or checking if the expected benefits have been achieved. There is no dedicated evaluation function, and benefits such as improved efficiency, productivity, or patient experience are often described rather than measured.

- 45 The lack of regular post-implementation reviews makes it hard to learn from experience, understand the impact of digital projects, and show whether investment is delivering value. As a result, while digital systems are being delivered and used, the Board does not receive clear assurance that they are delivering sustained improvements.

Recommendations

47 The following table details the recommendations arising from our work.

R1 The Trust should strengthen its Digital Plan by:

- 1.1** outlining its current level of digital maturity and the measures it will use to track maturity and success over time. (**Paragraph 12**)
- 1.2** setting clear milestones, details of ownership, and resource needs. (**Paragraph 13**)

R2 The Trust should improve digital reporting by:

- 2.1** including clear milestones, measures of progress and outcome, risk updates and more consistent information across programmes. (**Paragraph 17**)
- 2.2** using plain language and explaining technical terms, so reports are easy to understand and support effective challenge. (**Paragraph 18**)

R3 The Trust should strengthen its Board Assurance Framework by clearly identifying and describing risks to digital transformation, including delivery, capacity, and resource related risks. (**Paragraph 21**)

R4 The Trust should develop a clear, costed digital infrastructure replacement plan with timelines, milestones, asset information, and long-term investment needs. This should be supported by clearer reporting on how effectively infrastructure risks are being managed. **(Paragraph 23)**

R5 The Trust should develop a clear AI strategy and governance framework. This should set out how AI will be used across the organisation, the expected benefits, how success will be measured, and how risks will be managed. **(Paragraph 27)**

R6 The Trust should develop a structured approach to understanding and building its digital workforce capability by:

- 6.1** maximising use of HEIW's Digital Capability Framework to assess basic digital confidence. **(Paragraph 29)**
- 6.2** developing a local assessment of the wider digital skills needed to deliver the Trust's digital ambitions. **(Paragraph 29)**
- 6.3** developing a targeted, role-specific training and learning programme beyond basic e-learning, including data and digital change skills. **(Paragraph 30 and 31)**
- 6.4** developing a strategic digital workforce plan that sets out required staffing levels, roles, competencies and future capacity needs, informed by a clear baseline of current digital workforce capability. **(Paragraph 32)**

- R7** The Trust should develop a clear approach to engagement and digital inclusion by:
- 7.1** introducing a framework to involve staff and service users in digital design and delivery. (**Paragraph 33**)
 - 7.2** developing a digital inclusion plan with clear priorities, actions, measures, and risk management arrangements. (**Paragraph 35**)
 - 7.3** improving Board reporting on engagement and digital inclusion activity and impact. (**Paragraph 35**)

- R8** The Trust should set out clear, costed investment plans for digital transformation, including capital and revenue needs beyond 2025-26. (**Paragraph 36**)

- R9** The Trust should introduce a consistent post-implementation review process to assess whether digital investments deliver benefits, value for money, and better use of resources. (**Paragraph 45**)

Appendices

1 About our work

Scope of the audit

The goal of this audit is to find out if the Trust is using digital technology to support service modernisation and efficiency. This included the approach to strategy, leadership and skills development for digital transformation, and how risks around digital infrastructure, cyber resilience and artificial intelligence are being managed.

Audit questions and criteria

Questions

Our audit addressed the following questions:

- Does the Trust have a well-led and appropriately resourced approach to digital transformation?
- Is the Trust developing the digital skills, capacity, and capability of its workforce?
- Does the Trust have a clear plan for managing its cyber resilience arrangements and digital infrastructure and how they will need to change to support its digital transformation ambitions?
- Does the Trust engage effectively with staff, partners, patients / service users to deliver its digital transformation ambitions and minimise digital exclusion risks?
- Is the Trust actively utilising new digital technology and data solutions to enhance the accessibility, quality, efficiency, and productivity of its services?

Criteria

Our audit questions were shaped by:

- External reference input from the Welsh Government, all-Wales NHS Directors of Digital, and Digital Health & Care Wales.

- Relevant Welsh Government strategies and plans.
- Relevant NHS Digital Transformation review reports completed by the National Audit Office and House of Commons Health and Social Care Committee.
- NHS England Department of Health & Social Care: A plan for digital health and social care policy paper.
- NHS England Transformation Directorate: What good looks like framework.

Methods

We asked the Trust to:

- Complete a self-assessment to help us understand how the organisation is undertaking digital transformation.
- Give us facts and figures about its spending on digital technology, staff digital skills, cyber resilience, and how it involves people in digital transformation.

We reviewed a range of documents, including:

- Board and committee papers and minutes.
- Key governance documents, including Finance and Performance Committee reports and Board papers.
- Key strategies and plans, including the Digital Plan, IMTP 2025-28 and Annual Plan.
- Key risk management documents, including the BAF.
- Relevant policies and procedures.
- Reports prepared by other relevant external bodies.

We interviewed the following key stakeholders:

- Director of Digital Services.
- Interim Chief Executive.
- Assistant Director of Finance.

We observed Board meetings as well as meetings of the Finance and Performance Committee.

2 Key terms in this report

Term	Description
Digital Plan ('Our Digital Plan')	The Trust's strategy for digital.
Integrated Medium-Term Plan (IMTP)	An IMTP is a three-year plan that sets out how the organisation will deliver its services, manage its workforce, and meet its financial duties to break even. The organisation submits its plan to the Welsh Government for approval.
Digital and Data Roadmap	The programme of digital priorities within the IMTP.
Digital maturity	The organisation's capability to use digital effectively, often assessed against a framework.
Health Information and Management Systems Society (HIMSS)	The HIMSS is a global non-profit organisation dedicated to improving health through the best use of information technology and management systems.
Electronic Medical Record Adoption Model (EMRAM) Assessment	The EMRAM is a strategic, eight-stage (0–7) framework developed by HIMSS to measure, benchmark, and improve a hospital's digital maturity. It guides organizations from paper-based systems to a fully electronic, paperless environment, aiming to enhance patient safety, clinical outcomes, and efficiency.

Term	Description
Board Assurance Framework (BAF)	A BAF in the NHS is a structured, strategic tool used by boards to monitor risks that threaten the achievement of corporate objectives.
Network and Information Systems (NIS) Regulations 2018	The NIS Regulations 2018 aim to improve the cybersecurity and resilience of systems that provide essential services.
Artificial Intelligence (AI)	AI is the ability of machines, computer systems, or robots to mimic human intelligence, learning, and decision-making to perform specific tasks.
HEIW's Digital Capability Framework	A national model outlining the digital skills, behaviours and confidence health and care staff need, organised into six capability domains with a self-assessment tool for development.
User engagement	Involving staff, patients and service users in digital design and delivery.
Digital skills baseline	An assessment of current digital capability across the workforce.
Digital inclusion	Ensuring digital services are accessible to people with different needs and abilities.
Digital exclusion	Barriers that prevent people from accessing or using digital services.
NHS 111	The national non-emergency health advice service.
Electronic Patient Care Record (ePCR)	The digital record used by ambulance clinicians.

Term	Description
Dispatch and control room systems	Systems used to manage emergency response and deployment.
Cloud-based systems	Digital systems hosted online rather than on local servers.
Once For Wales	National approach in NHS Wales where a digital system, process or standard is designed, procured and implemented once at a national level, rather than each health board creating its own version.
Post-implementation review (PIR)	A review to assess whether a project delivered its intended benefits.

3 Managemnt response form

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R1	The Trust should strengthen its Digital Plan by:			
R1.1	outlining its current level of digital maturity and the measures it will use to track maturity and success over time. (Paragraph 12)	The Trust accepts this recommendation. As part of the ongoing refresh of the Digital Plan, a formal digital maturity baseline will be established using recognised maturity frameworks, alongside locally agreed measures. The Trust will assess the most appropriate framework and benchmarking approach for its operational context, recognising its unique position as the only ambulance trust within NHS Wales. This will include consideration of relevant peer benchmarking beyond Wales, where appropriate, alongside national NHS Wales comparators and longitudinal assessment of the Trust's own maturity over time. This approach will provide a consistent means of assessing progress, identifying areas for improvement and demonstrating advancement against strategic outcomes rather than technology implementation alone.	March 2027	Director of Digital Services

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R1.2	setting clear milestones, details of ownership, and resource needs. (Paragraph 13)	The Trust agrees that future iterations of the Digital Plan should provide greater clarity around ownership, milestones and resource assumptions. This work will be delivered through the development of the Trust's new Digital, Data and Technology (DDaT) governance framework and Digital Oversight Group (DOG), which will provide strengthened governance, clearer accountability, delivery milestones and oversight arrangements across the digital portfolio.	March 2027	Director of Digital Services
R2	The Trust should improve digital reporting by:			
R2.1	including clear milestones, measures of progress and outcome, risk updates and more consistent information across programmes. (Paragraph 17)	The Trust accepts this recommendation. Work is already underway following the recent Good Governance Institute review to strengthen digital governance and assurance arrangements. Standardised reporting templates will be introduced to provide clearer milestones, delivery status, benefits, strategic alignment, key risks and outcome measures across all major digital programmes.	March 2027	Director of Digital Services

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R2.2	using plain language and explaining technical terms, so reports are easy to understand and support effective challenge. (Paragraph 18)	The Trust agrees. Future Board reporting will place greater emphasis on strategic outcomes using plain English, supported by concise explanations of technical terminology where appropriate. Reporting will focus on enabling effective Board scrutiny rather than technical delivery updates alone.	December 2026	Director of Digital Services
R3	The Trust should strengthen its Board Assurance Framework by clearly identifying and describing risks to digital transformation, including delivery, capacity, and resource related risks. (Paragraph 21)	The Trust accepts this recommendation. As part of the wider review of corporate governance following the Good Governance Institute review, the Board Assurance Framework will be updated to include a dedicated strategic risk relating to digital transformation. This will better reflect risks associated with programme delivery, workforce capacity, dependency management, affordability and organisational change.	December 2026	Director of Digital Services
R4	The Trust should develop a clear, costed digital infrastructure replacement plan with timelines, milestones, asset information, and long-term investment needs. This should be supported by clearer reporting on how	The Trust agrees that a more strategic view of infrastructure investment would strengthen assurance. Existing lifecycle information, cyber risk assessments and infrastructure roadmaps will be consolidated into a longer-term infrastructure replacement plan identifying asset lifecycles, prioritised replacement requirements and estimated investment needs. However, the Trust notes that	June 2027	Assistant Director of Digital: ICT

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
	effectively infrastructure risks are being managed. (Paragraph 23)	NHS Wales financial planning operates on an annual planning cycle, with future capital allocations confirmed annually. Whilst a longer-term costed replacement plan will improve strategic planning and prioritisation, it cannot provide assurance that identified investment requirements beyond approved funding periods will be deliverable until funding allocations are confirmed.		
R5	The Trust should develop a clear AI strategy and governance framework. This should set out how AI will be used across the organisation, the expected benefits, how success will be measured, and how risks will be managed. (Paragraph 27)	The Trust accepts this recommendation. An AI Strategy and Governance Framework is already in development and is planned for implementation during the current financial year. This will build upon the existing AI Steering Group and Board oversight arrangements, setting out priority use cases, governance, ethical principles, benefits realisation and risk management aligned to emerging national guidance for NHS Wales.	June 2027	Assistant Director of Digital: IDS
R6	The Trust should develop a structured approach to understanding and building its digital workforce capability by:			

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R6.1	maximising use of HEIW's Digital Capability Framework to assess basic digital confidence. (Paragraph 29)	The Trust accepts this recommendation. Greater promotion of the HEIW Digital Capability Framework will form part of the wider workforce development programme to improve understanding of baseline digital confidence across the organisation.	June 2027	Assistant Director of Digital: IDS
R6.2	developing a local assessment of the wider digital skills needed to deliver the Trust's digital ambitions. (Paragraph 29)	The Trust agrees with the principle of this recommendation. The Trust recognises the need to strengthen its approach to developing a digitally skilled workforce and has already begun taking tangible steps to address the gaps identified. The recent recruitment of a Head of Business Change and Benefits, alongside the appointment of a Digital Adoption Facilitator, provides dedicated leadership to establish a more structured and outcome-driven approach. Together, these roles will lead the development of a benefits realisation framework for digital projects, ensuring that digital investment translates into measurable improvements in capability and service delivery. This work will be supported by a stronger focus on user-centred design, with staff actively involved in co-designing new systems to ensure solutions are intuitive and aligned to operational needs. In addition, the establishment of a	June 2027	Assistant Director of Digital Services: Innovation & Transformation

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		Digital Champions network will create localised support and peer-led learning opportunities, helping to embed digital skills across the workforce and improve adoption of new technologies. These initiatives represent a shift towards a more coordinated and sustainable model for digital skills development, including clearer approaches to skills assessment, gap identification, targeted training, and measurement of impact.		
R6.3	developing a targeted, role-specific training and learning programme beyond basic e-learning, including data and digital change skills. (Paragraph 30 and 31)	The Trust accepts this recommendation. A structured digital learning and capability programme will be developed bringing together existing training, digital change capability, data literacy, AI awareness and leadership development into a coherent programme aligned to role requirements. This recognises that previous investment priorities have necessarily focused on maintaining critical operational services rather than broader organisational capability development.	June 2028	Director of People & Culture / Director of Digital Services

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R6.4	developing a strategic digital workforce plan that sets out required staffing levels, roles, competencies and future capacity needs, informed by a clear baseline of current digital workforce capability. (Paragraph 32)	The Trust agrees. A Digital Workforce Plan will be developed which establishes the current workforce baseline, future capability requirements and anticipated capacity needed to support delivery of the Digital Plan over the medium term.	September 2027	Director of Digital Services
R7	The Trust should develop a clear approach to engagement and digital inclusion by:			
R7.1	introducing a framework to involve staff and service users in digital design and delivery. (Paragraph 33)	The Trust accepts this recommendation. The Trust's Innovation Lab, currently in development and planned to launch during the current financial year, will provide a structured mechanism for engaging staff, patients and service users in the design, testing and evaluation of digital services. This will form the foundation of a broader engagement framework supporting co-design across future digital transformation programmes.	March 2027	Head of Digital Benefits

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
R7.2	developing a digital inclusion plan with clear priorities, actions, measures, and risk management arrangements. (Paragraph 35)	The Trust agrees. A Digital Inclusion Plan will be developed, building upon existing commitments within the Digital Plan. This will identify key priorities, ownership, measures of success and governance arrangements whilst aligning with wider equality and inclusion strategies across the Trust.	June 2027	Director of Digital Services
R7.3	improving Board reporting on engagement and digital inclusion activity and impact. (Paragraph 35)	The Trust agrees. The development of the new DDaT governance framework and Digital Oversight Group (DOG) will strengthen reporting arrangements for engagement and digital inclusion. The DDaT governance group will be responsible for reviewing agreed performance measures and KPIs, ensuring regular reporting of engagement activity, digital inclusion outcomes and the impact of user feedback to support Board assurance.	June 2027	Director of Digital Services
R8	The Trust should set out clear, costed investment plans for digital transformation, including capital and revenue needs beyond 2025-26. (Paragraph 36)	The Trust partially accepts this recommendation. The Trust will continue to strengthen the financial planning underpinning the Digital Plan by developing indicative multi-year investment profiles aligned to organisational priorities and infrastructure lifecycle requirements. However, recognising the NHS Wales financial planning environment, detailed costed investment plans beyond	June 2027	Director of Digital Services

Ref	Recommendation	Commentary on planned actions	Completion date for planned actions	Responsible officer (title)
		confirmed funding periods will necessarily remain indicative and subject to annual IMTP approval, capital allocations and national funding decisions.		
R9	The Trust should introduce a consistent post-implementation review process to assess whether digital investments deliver benefits, value for money, and better use of resources. (Paragraph 45)	The Trust accepts this recommendation. Since completion of this audit, the Trust has appointed a Head of Business Change and Benefits whose role includes establishing a consistent benefits realisation and post-implementation review framework across the digital portfolio. This work has commenced and will be embedded within the emerging DDaT governance arrangements, providing clearer oversight of benefits, lessons learned and value for money across major digital investments.	March 2027	Head of Digital change and benefits



About us

The Auditor General for Wales is independent of the Welsh Government and the Senedd. The Auditor General's role is to examine and report on the accounts of the Welsh Government, the NHS in Wales and other related public bodies, together with those of councils and other local government bodies. The Auditor General also reports on these organisations' use of resources and suggests ways they can improve.

The Auditor General carries out their work with the help of staff and other resources from the Wales Audit Office, which is a body set up to support, advise and monitor the Auditor General's work.

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