

15 March 2023

HCPC Internal and External audit recommendations tracker

Executive Summary

This report provides the Committee with progress updates on the implementation of recommendations arising from Internal and External audits. In addition, any significant Quality Assurance recommendations and recommendations arising from ISO standard audits will be added.

Recommendations which have been implemented have been removed from this report. The original numbering of recommendations has been retained.

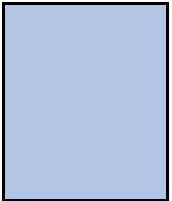
Please refer to individual internal audit reports for the background to recommendations.

Previous consideration	This is a standing item considered at each meeting of the Committee.
Decision	The Committee is asked to discuss and note the report.
Next steps	The next report will be received in June 2023
Strategic priority	All
Risk	All
Financial and resource implications	None as a result of this paper.
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ELT Sponsor	Claire Amor, Executive Director of Governance Assurance & Planning claire.amor@hcpc-uk.org

Internal Audit report – Registrant Forecasting Review (considered at Audit and Risk Assurance Committee 9 November 2022)

Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 3
Medium	5	Not yet due 0
Low	3	Completed 5



Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>1 • Future forecasts may be generated using incorrect input data, leading to inaccurate forecasted registrant numbers, which may then be relied upon for decision making such as making critical financial decisions for registrant fees.</p> <p>• Inconsistent and unclear file labelling may result in incorrect input data being applied in the model which can then result in inaccurate outputs of registrant numbers being calculated.</p> <p>A reconciliation should be completed between the prior months' registrant data and historical data included within the model.</p> <p>Input files should be consistently and logically labelled for each iteration of the model, to allow for consistently and help prevent error.</p> <p>Registrant data extracted and subsequently imported into the model should be reviewed by an additional staff member to allow for a second pair of eyes oversight to help ensure model accuracy.</p>	<p>This will form part of our monthend activities to ensure that both actuals and forecast figures are kept up-to-date. Our month-end timetable will include this as an action going forward.</p>	<p>January 2023</p> <p>Jagana Abubacarr – Finance BP</p> <p>Reviewer – Ifeoluwa Ojo, Senior Finance BP</p>	<p>Completed</p>	<p>This is complete and included in the month end timetable. We continue to maintain the model as previously, Finance continue to manually run registrants report from CE monthly to validate data. (JA)</p>	<p>N/A</p>

2	<p>Where updates made to the assumptions applied within the model are manually updated within the output report there is a risk that errors and conflicting numbers are produced which can result in ambiguity as to which is the correct data and thus the accuracy of the registrant numbers being produced which ultimately are used for decision making purposes.</p> <p>We recommend that a method of cross-referencing is considered between the output report generated by the model and the inputs section, to prevent users from potentially being misled.</p>	<p>This exercise will become part of the regular periodic reconciliations for our month-end reporting.</p>	<p>January 2023</p> <p>Jagana Abubacarr – Finance BP</p>	<p>Revised completion date: end of March 2023</p>	<p>This process will fully be in place by end of March 2023 (JA)</p>	<p>N/A</p>
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<p>3</p> <ul style="list-style-type: none"> • If relevant staff members from across HCPC do not attend the monthly discussions on trends that may affect the model and thus registrant numbers, important information may not be passed on to the Forecasting team, potentially compromising the accuracy of the model. For example, if the Education department do not attend and they are aware of new colleges/universities opening which may impact future numbers. • Without formal actions being recorded from the meeting, there is a risk that adjustments to the model are not made and the model is based on outdated assumptions <p>We recommend that HCPC outlines a list of required attendees for each monthly discussion to ensure a representative from each relevant team is in attendance.</p> <p>Additionally, if staff members do not feel the need to attend, they should notify the Chief Information Security & Risk Officer confirming they have nothing to report which could influence the parameters set within the model.</p> <p>We recommend that formal actions are recorded based on the outcomes of the discussions which take place. This is to ensure that required adjustments to the model and thus the assumptions the model is based on are made timely and seem reasonable. It will also allow for any staff that could not attend the meetings to see what, if any changes have been made.</p>	<p>We will create a specific Microsoft Teams Channel to collate the necessary documents, analysis and summary of actions and/or findings as part of ongoing meetings. This will also allow us to store 'live' files where appropriate action owners can provide input.</p>	<p>January 2023</p> <p>Ifeoluwa Ojo, Senior Finance BP</p>		<p>This is complete and a Teams Channel has been set up called Registration Forecasting Group (including Finance (Jagana/Ife), Registration (Richard), Insight Analytic (Gareth Davies), Roy Dun, Education (Jamie), Strategic Relationship Lead (Adam Haxell).) The meetings will be minuted and actions to update registration forecast match to those recommendation. (JA)</p>	<p>N/A</p>
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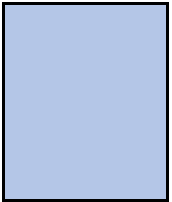
<p>4 Where there is manual intervention, for example extracting the number of registrants from the model and importing into the Financial model there is a risk that errors arise which can ultimately affect decision making and further numbers generated.</p> <p>4. a) Investigate whether it is possible to do an automated upload from the model into the Financial model. If this is not possible, consider whether the model can be adapted to include what is required for the Financial model with less manual intervention. A secondary check should be undertaken for all data extracted from the model that is incorporated into the Financial model to verify accuracy.</p> <p>4. b) Consider if it is possible to incorporate and thus easily identify from the model the number of registrants on discounted registrant fees and those on full registrant fees to support the Finance team further.</p>	<p>This is happening already, to a certain extent, whereby registrant numbers are extracted from the CRM system to inform our financial figures. Further work will need to be carried out to incorporate this seamlessly as part of the overall process.</p>	<p>January 2023</p> <p>Jagana Abubacarr – Finance BP</p>	<p style="background-color: red; color: red;">[Redacted]</p>	<p>Secondary sample check about 10% are now implemented on an ongoing basis. Automated upload and incorporating registrants fee type are still work in progress, the model will need to be re-engineered to accommodate this. (JA)</p>	<p>N/A</p>
<p>5 Variances in registrant data may go undetected, which may result in model adaptations not made and/or investigation into variances not taking place</p> <p>We recommend that the Forecasting team check whether the variance analysis built into the model operates as intended.</p>	<p>Once the full handover of registrant forecasting is completed and the area is managed by the Finance Team, we will create specific reports to identify key variances for the specific areas of income and the key drivers for the movements between actuals and forecast.</p>	<p>January 2023</p> <p>Ifeoluwa Ojo, Senior Finance BP</p>	<p style="background-color: red; color: red;">Revised completion date: end of September 2023</p>	<p>This is still under construction.</p> <p>We aim to complete by on or around end of September 2023 after go-live for new BC Re-implementation. (JA)</p>	<p>N/A</p>

<p>6 If reconciliations are not completed to compare the data from the registrant database and compare that to projections and historical data within the model, there is a risk that the removals data applied within the model is inaccurate, which can result in inaccurate registrant numbers being predicted.</p> <p>We recommend that a formal review process is implemented for registrant removal data. For example, where the removals of registrants from the system is above a defined percentage threshold this should be investigated.</p>	<p>Ongoing discussions are already taking place as part of weekly meetings between Finance and Registration Operations. This area will be noted as a point of discussion for further information and the findings will be captured within the Registrant Forecasting Teams Channel, once it is created.</p>	<p>January 2023</p> <p>Jagana Abubacarr – Finance BP</p>		<p>No changes to current average deregistration rate is predicted, but percentages will be monitored over time. (JA)</p>	<p>N/A</p>
<p>7 Users may access the model and make unauthorised changes, which could ultimately compromise the accuracy and integrity of the model and its output.</p> <p>We recommend that password protection is implemented to prevent unauthorised access to the model</p> <p>We recommend that cell controls are placed on historical data, as well as on critical functions and formulae.</p>	<p>Similar to previous comments, this will form part of the enhanced model that will be produced by the Finance Team.</p>	<p>January 2023</p> <p>Ifeoluwa Ojo, Senior Finance BP</p>		<p>Files are password protected. This is complete (JA)</p>	<p>N/A</p>
<p>8 Without a training video in place, there is a risk that users may not be able to follow the guidance for the model and use it correctly. This presents a risk that the model is not used and updated correctly and accurately which may result in inaccurate registrant forecasted numbers being produced.</p> <p>We recommend that a new training video is implemented, or the old version is recovered, which provides a walkthrough of how the model operates.</p> <p>The new training video/recovered video should then be made accessible to other staff members.</p>	<p>Upon completion of the new forecasting model, the Finance Team will produce the walkthrough video and store the file within the proposed Microsoft Teams Channel for Registrant Forecasting. Note. This will be the actual file and not a link to the file as a link will eventually expire and become inaccessible.</p>	<p>February 2023</p> <p>Ifeoluwa Ojo, Senior Finance BP</p>		<p>This is completed. Video was completed and shown to BDO. The video is accessible to staff members. (JA)</p>	<p>N/A</p>

Internal Audit report – Education Standards (considered at Audit and Risk Assurance Committee 9 June 2022)

Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 1
Medium	0	Not yet due 0
Low	1	Completed 0

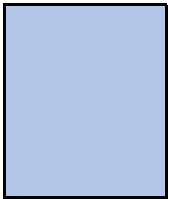


Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>1 Key Risk Area 1: Suitable organisations are appointed to deliver educational programmes</p> <p>HCPC should continue to keep the standards under review and provide an annual update to the Education and Training Committee highlighting any issues which have arisen that could prompt an interim review mid-cycle.</p>	<p>Action: Develop an annual reporting mechanism to highlight any issues that could prompt an interim review of the Standards to the Education and Training Committee.</p>	<p>Action Owner: Head of Policy, Standards and Strategic Relationships</p> <p>Completion date: 31/08/2022</p>	<p>Revised date 31 December 2022</p> <p>2nd Revised date: Due to commence Q4.</p>	<p>SETS review pushed back due to other priorities (fees, SCPEs review) and team capacity. Due to commence Q4.</p>	<p>Commentary History See Appendix 1 or</p> <p>[PRESS]</p>

Internal Audit report – Registration Payment Process (considered at Audit and Risk Assurance Committee 9 June 2022)

Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 0
Medium	1	Not yet due 1
Low	0	Completed 0



Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>2 Key Risk Area 2: Systematic issues from the 2020/21 financial reporting exercise have been cleared</p> <p>A long-term solution systems-based solution should be introduced which eliminates, as much as reasonably practicable, the requirement for complex monthly reconciliations and manual journal postings to HCPC's finance system.</p>	<p>Paper submitted to Exec Team stating that a retender will be undertaken to ensure we are covered by the correct CCS Framework agreement and a staggered project implementation approach, as we have an existing platform and partial implementation from which to build on. In the interim, we are close to completing our manual income reconciliations with a level of automation introduced within our files to produce expected revenue, based on our fee structure, which is dependent on the specific renewal cycle and also the type of applicant/registrant (UK or International). This is then compared against the amounts in Business Central and any differences are investigated and, thereafter, corrected within Business Central and/or Customer Engagement (CRM system). Once all corrections and adjustments are made, a final summary check will be carried out to ensure total amounts in BC versus total amounts for expected revenue match. Our reconciliation files will hold data on an individual basis, which will enable us to provide detailed backing of our recognised income and deferred income to audit.</p> <p>We have set a deadline for potential suppliers to submit their bids to undertake the Business Central Reimplementation Project by 10th June.</p>	<p>Action Owner: Doyin Adeleye (Finance Operations Manager)</p> <p>Completion date: 10 June for receipt of bids, timescales</p> <p>Date for a single finance system - 31 March 2023.</p>	<p>Revised Date: Provisional go live date is now JULY 2023</p>	<p>We are currently in the Vision and Validate process which should be finalised by 10/03/2023. The next step will be to conduct a UAT test for the new Business Central environment, followed by data migration and go live. Provisional go live date is now JULY 2023</p>	<p>Commentary History See Appendix 1 or</p> <p>[PRESS]</p>

Internal Audit report – HCPC Intelligence Gathering (considered at Audit and Risk Assurance Committee 10 March 2021)
 Internal Audit report – Follow up of recommendations (considered at Audit and Risk Assurance Committee 9 June 2022)
 Recommendations summary

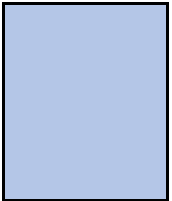


Priority	Outstanding recommendations	Status
High	0	Overdue 1
Medium	1	Not yet due 0
Low	0	Completed 0

Recommendation / Priority (RAG)	BDO's follow up review findings	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>4 Key Risk Area 1: Strategy and Governance 1.2 Data strategy – data platform approach</p> <p>Decisions need to be made formally on what data analysis work is done using the front line systems such as registration & FtP and that drawn from the new data platform. Some data may be available 'self-service' and other will need analysis work.</p>	<p>In Progress - The initial priorities for the Insight and Intelligence function have been defined in the Insight and Intelligence Framework approved in September 2021. We reviewed the approved Insight and Intelligence Framework document and the meeting minutes for the September 2021 Council meeting that showed the evidence of approval. A Council seminar was held on 7 April 2022 to receive and discuss analysis of FtP and EDI data to date. We reviewed the presentation pack for this seminar. We reviewed the data analysis document in relation to FtP and EDI presented to the Council Seminar on 7 April 2022. This is in line with the initial management response in relation to analysis of EDI and FtP.</p> <p>However, Management should establish a plan to develop the CPD analysis for this recommendation to be fully implemented, in addition to the analysis about EDI and FtP data.</p>	<p>Completion date: End of Q4 2021</p> <p>Responsible Officer: Geoff Kirk (Head of IT & Digital Transformation)</p> <p>Gareth Davies Head of Insight and Analytics</p>		<p>During 2022-23, the focus of the PDE work was on the HEE project deliverables and on EDI, as well as creating the core infrastructure needed for the data platform. Solutions are now in place in the data platform that deliver the HEE and EDI requirements. Work on Renewals is currently underway as the next agreed priority.</p> <p>A project proposal was submitted through the investment programme process for taking forward the work in 2023-24. Although the need for this work was acknowledged, the project was deemed to be unaffordable unless and until a fee increase is secured.</p> <p>Work will continue on the data platform utilising existing resources, but will of necessity be at a slower pace and with less certainty over timescales. Nevertheless an indicative plan has been drawn up, which prioritises the automation of existing FTP reporting to improve efficiency and resilience.</p>	<p>Commentary History See Appendix 1 or</p> <p>[PRESS]</p>

Internal Audit report – Safeguarding controls (considered at Audit and Risk Assurance Committee 9 March 2022)

Recommendations summary



Priority	Outstanding recommendations	Status
High	0	Overdue 2
Medium	3	Not yet due 1
Low	1	Completed 1

Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>Committee note (March 2022): The Committee commented that the report was helpful and provided some good assurance. Whilst some of the management actions were reported as being contained in workplans and therefore completed, the Committee agreed that those actions should remain active in the recommendation tracker with implementation dates until completed.</p>	N/A	N/A	N/A	N/A	N/A
<p>3 Key Risk Area 1: Controls to identify and assess safeguarding risks</p> <p>In addition to the warnings provided at initial and reregistration, we recommend that within the declarations section of the form, applicants are made aware that the failure to disclose relevant information could be treated as dishonesty and result in an FtP investigation more serious than the matter not declared from the outset.</p>	<p>Action: Review the declarations section of the form to make the guidance more prominent with regards to consequences of making false declarations.</p>	<p>Action Owner: Richard Houghton Completion date: 30 April 2022</p>	Completed	<p>The change to the online application form was deployed on the 8 November 2022, as planned.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

<p>4 Key Risk Area 2: Guidance to registrants on standards and safeguarding risks</p> <p>HCPC should develop a suite of safeguarding materials aimed at assisting registrants manage key safeguarding risks which they may encounter during the course of their professional roles. These materials should be readily available to registrants through HCPC's website. This should be benchmarked against the safeguarding materials provided by other healthcare professions regulators.</p> <p>HCPC should also consider delivering specific safeguarding guidance sessions as part of the programme of Professional Liaison Service webinars.</p>	<p>While we have materials relevant to safeguarding (eg #MyStandards webinars) these are not readily accessible or specifically flagged as safeguarding materials. There is an opportunity to review our materials and update/improve them via the planned review of our Standards of Conduct, Performance and Ethics, due in 2022/23.</p> <p>Action:</p> <p>(1) Add to 2022/23 Policy and Comms team workplans.</p> <p>(2) Add safeguarding to 2022/23 Prof Liaison event programme.</p>	<p>Action Owners:</p> <p>Emma Leary (Head of Policy),</p> <p>Kellie Green, (Head of Professionalism),</p> <p>Tony Glazier (Communication s Lead)</p>		<p>Policy RG: Work continuing on the SCPE review with draft consultation going to Council in March 2023. This will inform later consultation on safeguarding guidance currently scheduled for launch end Q3 2023-24.</p> <p>KT: Plans to deliver five #myhpcstandards webinars from April to July 2023 focused on the revised Standards of proficiency. These will include changes made to wording related to safe guarding</p> <p>TG: Comms plan in place to support delivery and promotion of upcoming webinars and supportive content relating to the new standards, including on the safeguarding topic.</p>	<p>Commentary History See Appendix 1 or</p> <p>[PRESS]</p>
<p>5 Key Risk Area 3: Responding to complaints or referrals relating to a registrant's conduct</p> <p>The Case Management Manual document should be formally reviewed and updated to ensure that it accurately reflects the latest case management processes.</p> <p>As part of this review, specific guidance on identifying safeguarding concerns should be detailed within the document. This could be done by also making reference to HCPC's internal Safeguarding Policy.</p>	<p>Action:</p> <p>The Case Management Manual is in the process of being replaced with a series of Best Practise Standards (BPS). This includes a BPS on Risk Assessment.</p> <p>Developing FtP approach and guidance on safeguarding referrals for the wider team is a workplan activity for 2022-23.</p>	<p>Action Owner:</p> <p>Kellie Green (Head of FtP)</p> <p>BPS development and go live by end of April 2022</p> <p>Safeguarding procedure for FTP development, training and roll out by end of Q3 2022-23.</p>	<p>Best Practice Standard on Risk Assessment is live</p> <p>Best Practice Standard on Safeguarding currently in draft and requires final review. Completion date now end Q4 2022-23.</p>	<p>Best Practice Standard on Safeguarding currently in draft and requires final review, sign off and implmentation. Completion date now end Q4 2022-23.</p>	<p>Commentary History See Appendix 1 or</p> <p>[PRESS]</p>

6	<p>Key Risk Area 4: Controls to identify safeguarding issues identified through DBS</p> <p>HCPC should explore the feasibility of having a formal relationship with Disclosure Scotland as it currently has with the DBS, whereby the DBS proactively alerts the HCPC of registrants who have been arrested or convicted for a serious criminal offence.</p>	<p>Action: The DBS covers both England and Wales and NI. We do have a relationship with Disclosure Scotland and receive information from them, but we do not have a formal MOU with them. The feasibility of implementing a formal relationship will be explored.</p>	<p>Action Owner: Roy Dunn</p> <p>Completion date: 31 July 2022</p>		<p>Chased in November, there are no outstanding requirements from HCPC, just awaiting their (Disclosure Scotland) response as of 4th November 2022.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>
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Internal Audit report – Financial Modelling (considered at Audit and Risk Assurance Committee 16 September 2021)

Recommendations summary

Priority	Outstanding recommendations	Status
High	4	Overdue 2
Medium	2	Not yet due 0
Low	0	Completed 4



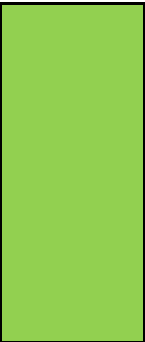
Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>1 Key Risk Area 1: Financial modelling spreadsheets are supported by detailed guidance</p> <p>HCPC should prepare a detailed guidance / technical document for the Budget Costs Model, in the same way as prepared for the Income Model.</p> <p>The preparation of this document should support the already existing flow charts within the model itself, and focus on how the model technically operates. This will support ensuring that the Business Central system performs the same functions (as these will be documented and so can be checked) and, in the event to delays to the implementation of Business Central’s functions in this area, support the ongoing operation of the model if needed.</p>	<p>The instructions tab was part of the design of the budget costs model as it was intended as a short-term reporting fix until the variance analysis could be built-into the financial accounting systems. It was the intention that the budget reporting function within the Business Central system could be used as part of the consolidation of finance systems.</p> <p>If the financial accounting systems have not got the required functionality by the end of the 21-22 financial year, then we will need to assess the validity of using the model.</p> <p>Action: Recommendation to be reviewed in Q4 FY21/22 in light of progress on systems developments.</p>	<p>Head of Finance</p> <p>Due: February 2022</p>	<p>Revised completion date: March 2023 - Complete</p>	<p>Training videos have been completed for Registrant forecasting and are stored on Microsoft teams channel.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

<p>3 Key Risk Area 3: Methods and approach to identifying and allocating costs within the Cost Model</p> <p>HCPC should develop and introduce a costs forecasting model which estimates its costs into future years. This model should be designed to complement the Income Model and set out key assumptions and variables, each of which can be independently configured.</p> <p>Each year a financial planning exercise should be undertaken where both the income and costs models are updated with their latest assumptions with the outputs presented to Council for review. These should also be subjected to sensitivity analysis / stress testing so that HCPC can identify which variables have the greatest impact on the organisation's financial health.</p>	<p>The recommendations are outside the design scope of the budget cost model. The development of a robust cost model, particularly for FTP, is a priority given that FTP cases can take a few years to conclude.</p> <p>Action: The Exec Director of Corporate Services, when appointed will need to review the complete budgeting process.</p>	<p>Executive Director of Resources and Business Performance</p> <p>Due: Dec 2021</p>	<p>revised completion date: October 2022</p> <p>revised completion date: January 2023 - Complete</p>	<p>Budgeting process has been amended to include on the specific Microsoft teams channel the necessary documentation to collate, inform, analysis and provide summary of actions.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>
<p>8 Key Risk Area 5: Inflationary assumptions are appropriate and represent a fair estimate of increases and decreases to key variables</p> <p>HCPC should model a modest fee increase within the Income Model to aid the model more accurately predict income. This can either be estimated using an agreed inflationary assumption (accepting that HCPC's fee rules do not use this) or by modelling a flat increase after a certain period of time (for example every five years).</p>	<p>The income model was designed to model specific fee scenarios being proposed. It is a priority for Council to have a Fee Strategy in place and this requirement is linked to delivering the understanding of the impact of Fee Increase Options.</p> <p>Action: Continue to develop and refine the Options Analysis function.</p>	<p>Head of Finance</p> <p>March 2022</p>	<p>revised completion date: October 2022</p> <p>revised completion date: February 2022</p>	<p>In order to accurately predict income, we have requested IBM to develop a reporting tools in CE which will capture areas that are currently not being captured in the model, this is currently being develop by IBM. This will include incorporating reasonable assumptions in relation to fee increases.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

<p>9 Key Risk Area 6: Financial model updates timely and accurate</p> <p>The way in which data is exported from the new Business Central system should be assessed in the context of obtaining information in a format capable of easy uploading into the Income Model to keep its information as up-to-date as possible.</p> <p>Where a technical solution is being developed, an interim process should be introduced to facilitate keeping the Income Model updated with live performance data. A consistent approach should be decided upon, documented and then followed to resume the practice of updating the Income Model on a monthly basis.</p>	<p>The Income model was built prior to the new Registration System go-live and therefore was built to accept NetRegulate data. The development of the Registration System export / model input routines need to be completed.</p> <p>Action: Aligned to completing the model development.</p>	<p>Head of Finance</p> <p>Feb 2022</p> <p>Revised completion date: October 2022</p>	<p>revised completion date: October 2022</p> <p>revised completion date: February 2022</p>	<p>Interim process have been introduced and completed, technical solution are being included in the BC Re-implementation that is currently underway</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>
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Internal Audit report – Follow up of recommendations - Financial Modelling (considered at Audit and Risk Assurance Committee 11 June 2022) - Financial Modelling

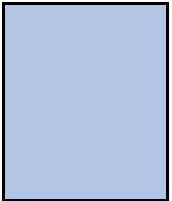
Recommendation / Priority (RAG)	BDO's follow up review findings	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>4 Key Risk Area 4: Income assumptions are reasonable and supported by detailed workings and independent approvals</p> <p>Registration behaviours for different professions should be reviewed annually with reference to supporting evidence and set for each specific profession rather than a generalised approach for all professions.</p>	<p>In Progress - The Registrant forecast working group meets on monthly basis. It includes the Head of Registration, Head of Education, Head of Financial Planning & Analysis, Head of Insight & Analytics, Communications & Digital Lead, CISRO. The group is informal and seeks input from other bodies around international recruitment plans, or any changes to UK graduate output in registrable professions. It occurs every second Tuesday of every month. We reviewed the recurring meeting invitation and agenda. The latest working group meeting occurred on 12 May 2022, we were advised that the group reviewed the final registrant numbers of the financial year and checked back to assumptions and how variation occurred. Due to the fact that there was not formal meeting minutes for the working group, we reviewed the record of meeting attendance and the internal meeting notes taken down by the CISRO. Once the report is presented to the ELT, this recommendation should be considered fully implemented.</p>	<p>Responsible Officer: Roy Dunn, CISRO</p>		<p>Future meetings will be organised every two months or more regularly, if new information comes to light that supports the forecasting process. These meetings will include reviews of the underlying assumptions & updates them as required.</p> <p>The description of the assumptions was in a paper to note to ELT dated 15th November 2022. Further support has been given to the Finance team involved.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

<p>6 Key Risk Area 4: Income assumptions are reasonable and supported by detailed workings and independent approvals</p> <p>Key financial inputs and inflationary assumptions should be subjected to an annual review and approval process by HCPC's EMT in advance of the model being updated.</p>	<p>see above</p>	<p>Responsible Officer: Margaret Osibowale (Project Finance Lead)</p>		<p>As part of the Annual budgeting process the input, income & inflationary assumptions were presented to key representatives of EMT & agreed by them.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>
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Internal Audit report – IT Controls (considered at Audit Committee 17 September 2020)

Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 1
Medium	1	On track 0
Low	0	Completed 0

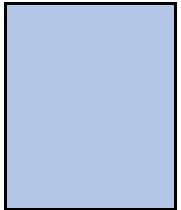


Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>1 Key Risk Area 1: The IT governance framework Key Risk Area 2: IT's support for the achievements of enterprise objectives</p> <p>HCPC should develop and introduce a formal IT Governance framework which aligns with the Code of Corporate Governance. The aim of the framework should be:</p> <ul style="list-style-type: none"> · To ensure that appropriate roles, responsibilities and accountabilities are established for data, system ownership, reporting and communications. This will build on the information which already forms part of the ISMS. · To report on IT Governance status and tracking of all IT Governance issues and remedial actions to closure; and · To define responsibility for key IT controls, particularly in respect of IT systems managed by business units. <p>The IT governance framework should be reviewed periodically, and updated as needed.</p>	<p>The Digital Transformation has an ambitious agenda and roadmap, which means we already recognise that there is a need to develop a Governance model to support transformation activity and operations.</p>	<p>Head of IT & Digital Transformation</p> <p>Due: Q1 2021</p> <p>Revised to Q2 2021</p>		<p>A gap analysis with the ITIL4 framework has been undertaken within the IT team. Processes and controls are continuing to be evolved with the new Product Management team to ensure clarity on roles and responsibilities. The ToR of the ISMS Board are being updated in order that this group can take on oversight of IT governance issues and actions as per the recommended action.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

Internal Audit report – Business Continuity Planning (considered at Audit Committee 4 March 2020)

Recommendations summary

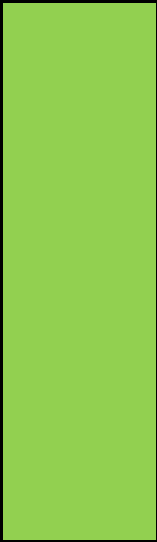
Priority	Outstanding recommendations	Status
High	0	Overdue 0
Medium	2	On track 0
Low	0	Completed 2



Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
6 Key Risk Area 5: Business continuity testing HCPC should address identified gaps in the current BCP and schedule another planned BCP test to ensure that updated areas are working effectively.	A further test will be carried out in the next Financial year COVID-19 response (essentially a major interruption to normal business operations negates any immediate requirement for BCP testing) March – June 2020.	CISRO 31/03/2020 NEW TARGET DATE: Dec 2022		Scenario reviewed by ELT, 15th Nov with GK present. The IT dept ransomware test is scheduled for the end of Feb 2023 and has now been undertaken.	Commentary History See Appendix 1 or [PRESS]

Internal Audit report – Follow up Audit - Business Continuity Planning (considered at Audit and Risk Assurance Committee 11 June 2021)

Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log

<p>9</p>	<p>HCPC should refresh Shadow Planner app training at least annually for users and could consider developing training and guidance to ensure a continued knowledge and awareness of the app.</p> <p>June 2021 - BDO's assessment of implementation during follow up audit:</p> <p>Standalone generic BCM / DR training is still being developed ahead of being provided to SMT, Business system owners and Heads of department.</p>	<p>Original Management Response: ShadowPlanner users are already trained on its use as the app is delivered to their device. Annual testing includes a training element. Standalone generic BCM/DR training is being developed for SMT & Business system owners and Heads of department.</p> <p>Updated Management Response as at June 2021: A training session with ShadowPlanner over Teams will be organised, or potentially an office based BCM exercise. However it must be remembered that the organisation is still operating under BCM conditions. The long term future of DR/BCM practises are being reviewed this financial year.</p>	<p>CISRO 31/03/2020</p> <p>NEW TARGET DATE: Summer 2022</p>		<p>The BCM/DR test was undertaken on Feb 28th and a report is being written by an external party. Further departmental (desktop) tests will be carried out as plans are updated over the year.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>
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HM External Auditor's report – Detailed control points (considered at Audit and Risk Assurance Committee and Council December 2021)

Recommendations summary

Priority	Outstanding recommendations	Status
Significant	0	Overdue 0
Important	1	On Track 0
Limited	1	Completed 2
Advisory	0	

RISK (RAG)	Recommendation / Priority (RAG)	Management response	Completion Date/Status	Update for Audit and Risk Committee (November 2022)
3	Income, deferred income and debtors are posted to the finance system using a number of control and suspense accounts. Suspense accounts are held within both BC and Sage and have not been reviewed or cleared down regularly. HM Update October 2022: There has been a significant improvement in this area, however there were still further clear downs required during the audit fieldwork. We therefore repeat our recommendation.	i) Data in BC (posted Sales Invoices) / Debtor Ledger to be validated before income and deferred Income is calculated. ii) Reconciliation between SAGE and BC for control completed to November 2021 with unreconciled differences highlighted and reasons addressed. Aim is to complete reconciliation of control accounts to 31 March 2022.	Brought Back on to the Tracker following 2022 Audit	Reconciliations of income, deferred income & debtors have been completed for the period ending 30/09/22, it is planned for these reconciliations for the period from 01-10-22 to 31-02-23, as part of the Y/E process..

6	<p>Our audit testing identified that the fixed asset register for intangibles was not always applying the right amortising rate for each asset. There is therefore a risk that assets are not held at an appropriate value.</p>	<p>We recommend that the asset register is reviewed periodically to ensure this issue does not arise in the future.</p> <p><u>HM Update October 2022:</u> This matter was an issue again in 2022, together with an overall issue with the amounts included in the TB and adjustments required to the intangibles fixed asset register –</p> <p>We note that a copy of the agreement signed by both parties could still not be provided in 2022. We therefore repeat our recommendation.</p>	<p>i) Review of fixed asset register and procedure for amortisation of Intangible Assets.</p> <p>ii) Determine if Assets included within Intangible Assets still has Useful Economic Life (e.g. current BC System and potential write-off).</p>		<p>As above, this action is complete</p> <p>The auditors have been provided with a signed copy of the Temporary register contract with DHSC</p>
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HM External Auditor's report 2022 – Detailed control points (considered at Audit and Risk Assurance Committee and Council October 2022)

Recommendations summary

Priority	Outstanding recommendations	Status
Significant	0	Overdue 0
Important	2	On Track 1
Limited	0	Completed 1
Advisory	0	

RISK	HM Comments/Proposals	Management response	Completion Date/Status	Update for Audit and Risk Committee (November 2022)
2 A payroll reconciliation was not provided until 4 August 2022. The late receipt suggests that payroll records are not being regularly reconciled to the accounting system and there is a risk that errors may not be identified at the earliest opportunity.	i) We recommend that management carry out reconciliations at least quarterly.	A monthly payroll reconciliation has been added to the timetable for the period ending 30th September and will be completed on a monthly basis going forward. It should be noted that the payroll process is subject to strict sign-off controls which were fully effective over the year, to ensure the accuracy and integrity of the monthly payroll.	Completed	These reconciliations are being undertaken on a monthly basis, action is complete.

<p>From our review of journals, we identified that not all journals are reviewed by someone other than the poster. There is a risk that incorrect postings may be made to the nominal ledger and that these would not be identified at the earliest opportunity.</p>	<p>We recommend that a policy is put in place regarding journal review.</p>	<p>HCPC has in place a review process for all journals. The issue identified was that the journal approvals were not all electronically filed in one place and therefore could not be provided to the auditors from the system; this was partly the result of staff turnover. HCPC will consider how best to tighten up this control, by filing all journal approvals electronically in one place, or ensuring that approvals are attached to the journal on the Sage system. The Financial Control team will also undertake a periodic review of journal approvals on a sample basis.</p>	<p>On Track</p>	<p>The financial control team has undertaken a review of the journals since 1 December 2022, and it was noted that some of the journals did not have approvals attached in Sage. Staff have been reminded of their responsibilities & follow up reviews will be undertaken periodically.</p>
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Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Education Standards	Nov-22	Sep-22	Jun-22	Mar-22	
<p>1 Key Risk Area 1: Suitable organisations are appointed to deliver educational programmes</p> <p>HCPC should continue to keep the standards under review and provide an annual update to the Education and Training Committee highlighting any issues which have arisen that could prompt an interim review mid-cycle.</p>	<p>Early planning for SETs review not due until the end of the year.</p>	<p>Early planning for SETs review not due until the end of the year.</p>	<p>N/A</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Registration Payment Process	Nov-22	Sep-22	Jun-22	Mar-22	
<p>2 Key Risk Area 2: Systematic issues from the 2020/21 financial reporting exercise have been cleared</p> <p>A long-term solution systems-based solution should be introduced which eliminates, as much as reasonably practicable, the requirement for complex monthly reconciliations and manual journal postings to HCPC's finance system.</p>	<p>The retendering process has now been completed and a preferred supplier identified. Contract negotiations are under way and initial steps towards formulating a project plan have commenced. The objective is to have a single finance system in place by 31 March 2023. Data cleansing of the existing system is ongoing.</p> <p>System-based solution to monthly income reconciliation will be incorporated into the new finance system. The deferred income model is in-scope as part of our BC Re-implementation.</p>	<p>The retendering process has now been completed and a preferred supplier identified. Contract negotiations are under way and initial steps towards formulating a project plan have commenced. The objective is to have a single finance system in place by 31 March 2023. Data cleansing of the existing system is ongoing.</p>	<p>N/A</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

HCPC Intelligence Gathering		Nov-22	Sep-22	Jun-22	Mar-22	
4	<p>Key Risk Area 1: Strategy and Governance 1.2 Data strategy – data platform approach</p> <p>Decisions need to be made formally on what data analysis work is done using the front line systems such as registration & FtP and that drawn from the new data platform. Some data may be available 'self-service' and other will need analysis work.</p>	<p>A new Programme for Data Excellence project board has been established, chaired by the Exec Director of Professional Practice and Insight. Part of the remit of this group is to review and prioritise the requests for new data and analyses that form the development backlog for the modern data platform and analytical tools that is being developed. The data platform is being developed incrementally in accordance with the priorities agreed through the PDE board.</p>	<p>An investigation has been undertaken into the current approach to CPD reporting which concluded there was no need to alter the approach until such time as the wider CPD policy review has been undertaken. An updated version of the FtP and EDI analysis is expected to be presented to ELT in September.</p>	N/A	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Safeguarding controls	Nov-22	Sep-22	Jun-22	Mar-22	
<p>3 Key Risk Area 1: Controls to identify and assess safeguarding risks</p> <p>In addition to the warnings provided at initial and reregistration, we recommend that within the declarations section of the form, applicants are made aware that the failure to disclose relevant information could be treated as dishonesty and result in an FtP investigation more serious than the matter not declared from the outset.</p>	<p>The change to the online application form is planned to be deployed on the 8 November 2022.</p>	<p>The declarations section has been reviewed and the form will be updated with the revised wording by the 30 September 2022.</p>	<p>The declarations section of the form is currently being reviewed and aiming to update the form by the 30 June 2022</p>	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
<p>4 Key Risk Area 2: Guidance to registrants on standards and safeguarding risks</p> <p>HCPC should develop a suite of safeguarding materials aimed at assisting registrants manage key safeguarding risks which they may encounter during the course of their professional roles. These materials should be readily available to registrants through HCPC's website. This should be benchmarked against the safeguarding materials provided by other healthcare professions regulators.</p> <p>HCPC should also consider delivering specific safeguarding guidance sessions as part of the programme of Professional Liaison Service webinars.</p>	<p>Policy: Work on the SCPE review has commenced, with consultation on the SCPEs due in January and a further consultation on Guidance relating to the SCPEs to follow afterwards.</p> <p>KG: #myhpcstandards webinar on safeguarding was delivered on 21 September 2022. 222 registrants attended and 95% rated the webinar as good and above in the evaluation form.</p> <p>TG: Promoting and supporting #myhpcstandards webinars, including those on safeguarding. Review and updates to safeguarding content in 2022/23 comms workplan</p>	<p>Policy - Review/updating of safeguarding materials to be included within SCPE guidance review. Work to commence on the guidance review in Q3/Q4 2022.</p> <p>KG - #myhpcstandards webinar on safeguarding will be held on 21 September 2022</p> <p>TG – Promoting and supporting #myhpcstandards webinars, including those on safeguarding. Review and updates to safeguarding content in 2022/23 comms workplan.</p>	<p>Policy - Reviewing/updating safeguarding materials included in Policy Team workplan for 2022/23.</p> <p>KG - #myhpcstandards webinars exploring safeguarding will be delivered in September and November 2022. Content is currently being developed.</p> <p>TG – Supporting #myhpcstandards webinars Review and updates to safeguarding content in 2022/23 comms workplan.</p>	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
<p>5 Key Risk Area 3: Responding to complaints or referrals relating to a registrant's conduct</p> <p>The Case Management Manual document should be formally reviewed and updated to ensure that it accurately reflects the latest case management processes.</p> <p>As part of this review, specific guidance on identifying safeguarding concerns should be detailed within the document. This could be done by also making reference to HCPC's internal Safeguarding Policy.</p>	<p>Still on track to commence work later in Q3.</p>	<p>Next phase of work due to commence by the end of Q3.</p>	<p>Roll out of new Best Practice Standards will be completed in June. We are taking phased approach to roll out given the number of documents.</p> <p>Best Practice Standard on Risk Assessment is live.</p>	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

<p>6 Key Risk Area 4: Controls to identify safeguarding issues identified through DBS</p> <p>HCPC should explore the feasibility of having a formal relationship with Disclosure Scotland as it currently has with the DBS, whereby the DBS proactively alerts the HCPC of registrants who have been arrested or convicted for a serious criminal offence.</p>	<p>Still awaiting response for Disclosure Scotland, will chase contact imminently.</p>	<p>The Disclosure Scotland template has been populated by HCPC, and we await a final version for validation and signature.</p>	<p>Disclosure Scotland were contacted, and responded 31st May indicating their Governance team will progress a MoU, and be in contact shortly.</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
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Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Financial Modelling review	Nov-22	Sep-22	Jun-22	Mar-22	
<p>1 Key Risk Area 1: Financial modelling spreadsheets are supported by detailed guidance</p> <p>HCPC should prepare a detailed guidance / technical document for the Budget Costs Model, in the same way as prepared for the Income Model.</p> <p>The preparation of this document should support the already existing flow charts within the model itself, and focus on how the model technically operates. This will support ensuring that the Business Central system performs the same functions (as these will be documented and so can be checked) and, in the event to delays to the implementation of Business Central's functions in this area, support the ongoing operation of the model if needed.</p>	<p>As per the internal audit report, the remaining action of creating a training video will be completed for Feb/Mar 2023. Upon completion of the new forecasting model, the Finance Team will produce the walkthrough video and store the file within the proposed Microsoft Teams Channel for Registrant Forecasting. Note. This will be the actual file and not a link to the file as a link will eventually expire and become inaccessible.</p>	<p>We have a designated Project Manager assigned to the BC Reimplementation Project with key finance resources to provide requirements, which will include the management reporting functionalities that will be closely linked to the finalisation of a revised Chart of Accounts. KPMG have been selected as the preferred supplier and contract negotiations are currently underway with the aim of implementing the system by March 2023.</p>	<p>We have recently appointed a Systems Accountant who is now the Project Lead for the BC Reimplementation. Due to the business submitting a retender for the BC Reimplementation project, we will be reassessing the requirements for our reporting needs and pull together a revised Chart of Accounts once a successful supplier is awarded the contract and we commence the requirements gathering phase of the project.</p>	<p>Requirements for Business Central are being reviewed on a first principles basis which includes uncoupling from the registration system. The Systems Accountant, once they are appointed, will be taking this work forward. The completion date is likely to be October 2022.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
<p>3 Key Risk Area 3: Methods and approach to identifying and allocating costs within the Cost Model</p> <p>HCPC should develop and introduce a costs forecasting model which estimates its costs into future years. This model should be designed to complement the Income Model and set out key assumptions and variables, each of which can be independently configured.</p> <p>Each year a financial planning exercise should be undertaken where both the income and costs models are updated with their latest assumptions with the outputs presented to Council for review. These should also be subjected to sensitivity analysis / stress testing so that HCPC can identify which variables have the greatest impact on the organisation's financial health.</p>	<p>As per the Internal Audit Report - We will create a specific Microsoft Teams Channel to collate the necessary documents, analysis and summary of actions and/or findings as part of ongoing meetings. This will also allow us to store 'live' files where appropriate action owners can provide input.</p>	<p>The Senior Finance Business Partner will be heading the monthly forecasting meetings and will tailor the current model to generate accurate income figures for reporting. The high-level handover has taken place as part of the Q1 Forecast. Going forward, a new model is being produced to factor in additional scenarios and assumptions.</p>	<p>The appointment of the Senior Finance Business Partner has meant that they will be joining the monthly forecasting meetings and get up-to-speed with the functionality of the current model. This will be pushed back to Jul-22 where the Q1 Forecast will need to be produced with the use of the corrected forecasting model.</p>	<p>Alan Keshtmand, HoF - pending more fundamental improvements to HCPS's income and cost modelling, a number of scenarios are being developed by the FP&A Manager as part of the FY22-23 budgeting cycle and will be presented within the budget paper for March 2022.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

<p>8 Key Risk Area 5: Inflationary assumptions are appropriate and represent a fair estimate of increases and decreases to key variables</p> <p>HCPC should model a modest fee increase within the Income Model to aid the model more accurately predict income. This can either be estimated using an agreed inflationary assumption (accepting that HCPC's fee rules do not use this) or by modelling a flat increase after a certain period of time (for example every five years).</p>	<p>As per the management responses within the Internal Audit Report, we are aiming to complete the remaining handover of the remaining items before the end of the calendar year and produce an enhanced model that captures both volumes and associated financials within one financial model with input tabs that capture assumptions (e.g. inflationary pressures), enable variance analysis against projections and allow dynamic updates to figures.</p>	<p>We are now in the formal consultation phase of the income fee rise proposal. Worst, middle and best case scenarios were put together as part of the proposal and finalisation of the consultation document. The work also suggested the implementation of an inflationary rise to fees, which will bring us regular incremental increases without the need for formal consultations in the future.</p>	<p>Under consideration</p>	<p>When ELT develop the fee increase proposals, the specific scenarios will be modelled to evaluate the financial impact of each scenario. A number of scenarios are being developed based on the current fee structure to give an indicative view of potential fee rises to the organisation's financial position. This will form part of the FY22-23 budgeting cycle and will be presented within the budget paper for March 2022.</p>	<p>To return to the main Summary and Tracker Scroll up or [PRESS]</p>
<p>9 Key Risk Area 6: Financial model updates timely and accurate</p> <p>The way in which data is exported from the new Business Central system should be assessed in the context of obtaining information in a format capable of easy uploading into the Income Model to keep its information as up-to-date as possible. Where a technical solution is being developed, an interim process should be introduced to facilitate keeping the Income Model updated with live performance data. A consistent approach should be decided upon, documented and then followed to resume the practice of updating the Income Model on a monthly basis.</p>	<p>Similar to the above comment for Key Risk Area 5 - Ongoing discussions are already taking place as part of weekly meetings between Finance and Registration Operations. This area will be noted as a point of discussion for further information and the findings will be captured within the Registrant Forecasting Teams Channel, once it is created.</p>	<p>See (1) above</p>	<p>See (1) above Similar to the first point, we will need to assess our reporting requirements once a successful supplier is awarded the contract for the reimplementation of BC.</p>	<p>See (1) above Requirements for Business Central are being reviewed on a first principles basis which includes uncoupling from the registration system. The Systems Accountant, once they are appointed, will be taking this work forward. The completion date is likely to be April 2022.</p>	<p>To return to the main Summary and Tracker Scroll up or [PRESS]</p>
<p>Key Risk Area 4: Income assumptions are reasonable and supported by detailed workings and independent approvals</p> <p>Registration behaviours for different professions should be reviewed annually with reference to supporting evidence and set for each specific profession rather than a generalised approach for all professions.</p>	<p>Unfortunately the September meeting did not draw a full list of attendees, but was focused on how the existing model works. The report will be sent to note at ELT, and passed on to Finance as a starting point as they take over the process.</p>	<p>A draft report for ELT has been produced. This will be shared with the rest of the Registration Forecasting group on 13th September, before going to the next available ELT meeting. The Reg forecast has been handed over to the Finance dept to maintain. CISRO has provided documentation and several hours support on the model as Finance get to grips with it.</p>	<p>N/A</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or [PRESS]</p>

<p>Key Risk Area 4: Income assumptions are reasonable and supported by detailed workings and independent approvals</p> <p>Key financial inputs and inflationary assumptions should be subjected to an annual review and approval process by HCPC's EMT in advance of the model being updated.</p>	see above	see above	N/A	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
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Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

	IT Controls	Nov-22	Sep-22	Jun-22	Mar-22	
1	<p>Key Risk Area 1: The IT governance framework Key Risk Area 2: IT's support for the achievements of enterprise objectives</p> <p>HCPC should develop and introduce a formal IT Governance framework which aligns with the Code of Corporate Governance. The aim of the framework should be:</p> <ul style="list-style-type: none"> · To ensure that appropriate roles, responsibilities and accountabilities are established for data, system ownership, reporting and communications. This will build on the information which already forms part of the ISMS. · To report on IT Governance status and tracking of all IT Governance issues and remedial actions to closure; and · To define responsibility for key IT controls, particularly in respect of IT systems managed by business units. <p>The IT governance framework should be reviewed periodically, and updated as needed.</p>	<p>The Digital Transformation Strategy is currently being refreshed, with an updated version due to be presented to Council in December 2022. Delivery of the strategy will be governed in accordance with the HCPC project management framework. A programme board for the Programme for Data Excellence has been established to provide clear governance around the data improvement agenda. Work is underway to clarify and document the roles and responsibilities across the IT and Business Change teams, and a gap analysis is being undertaken against the ITIL4 framework to identify any further areas for enhancement.</p>	<p>Head of IT&DT is currently working with Head of Business Change to define roles & responsibilities across these 2 teams, plus Analysis & Insight and operational teams where these overlap/interact. During Q2 a standard IT governance framework template such as ITIL4 will be used to document the approach, building on the information captured in the ISMS.</p>	<p>A review of the existing IT governance controls by the outgoing Director of Digital Transformation identified a number of gaps as well as a need to modernise the controls to support a more agile approach. The new Head of IT & DT will work with stakeholders to define and put in place a new framework that meets these objectives.</p>	<p>The new draft governance framework is currently being reviewed against COBIT framework, before being socialised with the wider organisation, in November.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Business continuity testing		Nov-22	Sep-22	Jun-22	Mar-22	
6	<p>Key Risk Area 5: Business continuity testing</p> <p>HCPC should address identified gaps in the current BCP and schedule another planned BCP test to ensure that updated areas are working effectively.</p>	<p>ELT will go through a Ransomware scenario on 15th November. This will then form the basis for an IT dept test on response.</p>	<p>ELT/SLG received instructional videos on the use of Shadow Planner along with some brief information on past incidents that have occurred (July). Updates to existing departmental plans are being collected to attempt to capture changes in requirements due to Hybrid working. A high level test not requiring Shadow Planner has already been devised for ELT.</p>	<p>Departmental scenario detail to be captured during the summer 2022 Assurance / Risk meetings with depts to incorporate Hybrid working scenarios.</p>	<p>Further users are being tested on ShadowPlanner, and a test arranged when it will not interrupt normal business flows.</p> <p>To speed up the testing process, we now propose to carry out departmental desk exercises over the next few months, although this will depend on new ways of working being</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
9	<p>HCPC should refresh Shadow Planner app training at least annually for users and could consider developing training and guidance to ensure a continued knowledge and awareness of the app.</p> <p>June 2021 - BDO's assessment of implementation during follow up audit:</p> <p>Standalone generic BCM / DR training is still being developed ahead of being provided to SMT, Business system owners and Heads of department.</p>	<p>ELT will go through a Ransomware scenario on 15th November. This will then form the basis for an IT dept test on response.</p>	<p>An ELT test is being scheduled with an IT test running the same scenario from an IT point of view.</p>	<p>SLG Video demonstration of Shadow Planner in June / July to SLG</p>	<p>Scenarios ready, not specifically around IT issues. Date will not be announced before hand to ensure realism of test.</p> <p>Awaiting a suitable time slot to run a test, possibly with SLG initially.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>