
Annual Review of the Operational Risk Register

Executive Summary

The Operational Risk Register (ORR) review is provided to the Audit & Risk Assurance Committee once a year around autumn. This review documents the changes in risks faced by different parts of HCPC over the year, and any broad changes to levels of inherent or residual risk that have a bearing on the organisation. Not all risks are documented in the review paper.

A copy of the latest iteration of the ORR is included with this paper.

Previous consideration	None
Decision	The Committee is invited to discuss the paper
Next steps	The Committee will receive the next iteration of this report at their meeting in September 2024
Strategic priority	Operational risks are mapped to strategic risks wherever possible. Risk appetite is gradually being included in the quarterly update process but needs to match any changes in appetite determined by Council.
Risk	None specific to this report
Financial and resource implications	None
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Operational Risk Register Overview

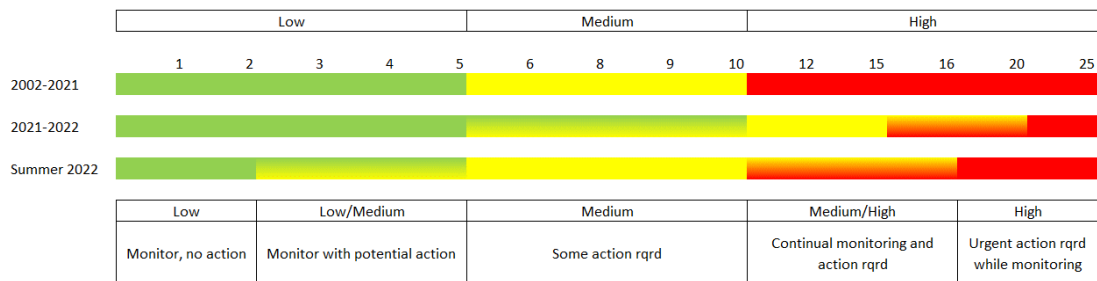
The Operational Risk Register (ORR) is updated quarterly via meetings with risk owners across the organisation. Often these updates provide incremental changes to inherent or residual risk levels reflecting changes in resources, or the completion of projects that deliver new capabilities.

Some departments occasionally completely review their risks, and start again from scratch. This has occurred with the Education Department and Business Change & Projects have added several new risks whilst reevaluating existing risks.

Other departments take a more iterative ongoing approach.

Risk Scoring

Levels of risk currently use the following matrix of scores.



Catastrophic	5	10	15	20	25
Significant	4	8	12	16	20
Moderate	3	6	9	12	15
Minor	2	4	6	8	10
Insignificant	1	2	3	4	5
	Highly Unlikely	Unlikely	Possible	Likely	Highly Likely

Risk score changes over time

At a high level we track the number of risks at the different residual risk levels possible, by department. It is possible to compare between August 2022 and August 2023. The first figure in each cell is the value for 2022. This is separated from the subsequent 2023 figure by one of the following symbols, < decreased number of risks, - no change in number of risks, > increase in number of risks.

Department - August 2022 / 2023	Low 1-2	Low/ Medium 3-5	Medium 6-10	Medium / High 11-15	High 16-25
Governance					
Information Governance & Security	0 - 0	2 > 3	4 > 6	0 - 0	0 - 0
Complaints	0 - 0	0 - 0	0 - 0	0 - 0	0 - 0
Quality Assurance	0 - 0	2 < 1	1 > 3	0 - 0	0 - 0
Governance	0 - 0	0 > 1	6 > 7	0 - 0	0 - 0
Partners (moved in Winter 2022)	0 - 0	0 - 0	3 > 5	1 > 3	0 - 0
Professional Practise and Insight					
Insight and Analytics	0 - 0	0 > 1	2 - 2	0 - 0	0 - 0
Policy and Strategic Relationships	0 - 0	0 - 0	7 < 4	1 - 1	0 - 0
Communication	0 - 0	1 < 0	4 > 6	0 > 1	0 - 0
Professionalism, and Upstream Regulation	0 - 0	0 > 1	3 > 4	1 > 0	0 - 0
Regulation					
Education	0 - 0	1 > 6	4 > 6	0 - 0	0 - 0
Fitness to Practise	0 - 0	1 < 0	4 > 8	1 > 0	0 - 0
Registration & CPD	0 - 0	1 > 2	6 > 11	8 > 4	0 - 0
Resources & Performance					
Estates & Facilities	0 > 1	3 < 2	2 > 2	1 > 2	0 - 0
Finance & Procurement	0 - 0	3 - 3	1 > 3	1 > 2	0 - 0
Information Technology	0 - 0	1 < 0	6 < 5	0 > 2	0 - 0
Human Resources	0 - 0	1 - 1	2 > 4	1 - 1	0 - 0
Business Change	0 > 4	1 > 10	6 < 1	6 < 1	0 - 0
Executive Leadership Team	0 - 0	0 - 0	7 > 11	3 - 3	0 - 0
TOTAL RISKS	0 > 5	17 > 31	65 > 88	23 < 20	0 - 0

High level influences on the Operational Risk Register 2022-23

Ongoing financial constraints resulted in some potential developments not being pursued in the current or previous financial year. The delay to the implementation of the fee rise due to lack of parliamentary time has further delayed the gradual increase in revenue that fee rises deliver.

At ELT level there has been change with the departure of the Executive Director of Professional Practise and Insight and the former Chief Executive. This resulted in changes to reporting lines across as the Executive Director of Governance, Assurance and Planning took on oversight of the departments within the directorate.

The Chief Executive & Registrar left the organisation at the end of the 2022 Calendar year. The Executive Director of Regulation, became Interim Deputy Chief Executive and The Head of Fitness to Practise became Acting Executive Director of Regulation.

These movements of employees resulted in a smaller number of highly experienced individuals in ELT & SLG, which was recognised as having a potential impact on the effectiveness of the core management teams. The new Chief Executive started in post in early July 2023.

The Professional Standards Authority (PSA) reported on increased assurance on HCPC's processes in June 2023 and several standards were regained, reflecting improvement in the processing and responsiveness in the Registration department, and Fitness to Practise. HCPC met 16 of the 18 standards of good regulation compared to 13 in the previous period. This reflected positively on the risks faced by the organisation.

The project to implement Business Central (BC) in Finance has delayed some other projects deemed of a lower priority, and this is reflected in being unable to implement the complete E5 security suite from Microsoft that we have licences for, slightly increasing our information security / cyber risk.

Not all existing risks are examined. If no change in inherent or post mitigation (residual) risk has been seen, and mitigations have not substantially changed, no comment is made in this review. Purely numeric risk numbers have been replaced by department specific numbers with letter codes, to ease the movement of risks as departments move or directorates consolidate. Where no numeric code is shown, the risk is relatively new.

Directorate risk overview

Governance, Assurance and Planning

Information Governance and Security

A new risk has been added around the trend of ongoing challenge to Fitness to Practise decisions via multiple FOI requests (GOV7) has developed increasing the workload amongst a small team. Subject Access Requests where complainants request the response to their complaint by the registrant and subsequent requests for review and threats of going to the ICO if not satisfied have grown.

Cyber security continues to be a risk of changing nature. As a small to medium sized organisation our resources are limited and we work with our major IT partners to provide adequate protection. A cyberattack that was successfully resisted by our existing multiple layer approach highlights that we are now definitely on the 'radar' of potential attackers, rather than just facing potential breaches by shotgun type attacks. Residual risks are currently stable. Individual risks have not therefore been broken out.

A risk has been added around not successfully migrating to the new ISO27001 standard in the current financial year. We are aiming for the current financial year rather than waiting for a potential overlap with regulatory reform work.

Assurance & Compliance

As Quality Assurance concentrate on remedial work in areas that frequently have issues (QA1/57) the risk of other areas being subject to less scrutiny and damaging issues being missed increases. Therefore there has been an increase in pre-mitigation impact and an increase in post mitigation likelihood over the year, as effort continues to focus on control of the higher profile known risk areas, whilst lower profile, apparently functioning areas receive relatively little attention. This is influenced by fewer audit resources in the QA area.

The risk of not meeting public standards (PSA) (QA2/58) has decreased over the year as the number of standards we meet has increased after the last PSA report was published. This results in a lower residual risk of 6, down from 8.

QA3, as with QA1, the development of improved processes in high risk areas takes away effort looking at supporting those areas perceived to be at lower risk, where unknown issues may require rectification. An increase in likelihood post mitigation, results in an increase in residual risk from 4 to 6 over the year.

QA4 is a new risk which relates to a lack of capacity for additional QA effort which may be required.

Governance

Corporate reporting continues to be a potential concern as reporting lines have again been adjusted over the year and whilst the pre and post mitigation likelihood have remained unchanged the post mitigation impact has been increased. (GOV1 / 43).

Council Effectiveness ((GOV3/49) risks has remained constant over the year. The Governance and Chair and Chief Executive support functions have now been split out to more fully achieve both functions. The areas should be monitored over the next few months to determine if the new Head of Governance, and Chair and Chief Executive Office function effectively.

The lack of engagement with the QA team risk (GOV4/49) has not changed over the year, but there has recently been a slight change in the structure of the QA department and now includes the Feedback & Complaints area where additional stakeholder origin information may provide advanced warning of issue developing under the surface.

The Vexatious use of the Feedback, or Freedom of Information or Subject Access Requests processes (GOV7) flags a new or potentially growing risk added in the last quarter, which may challenge the available resources either within the Feedback, Information Governance Team, or within the departments where information is held operationally and must be retrieved from. This will need to be monitored as a level of technical expertise is required to effectively manage responses.

General levels of resourcing within the Governance, Assurance and Planning Directorate (GOV8), and within the new Chair and Chief Executives Office (GOV9) will develop new demarcations of responsibility as the roles develop. The experience of members of both areas should enable the new roles to be supported adequately. These are currently at the lower end of Medium risk post mitigation.

Partners

The Partner team continues to evaluate the potential financial and process implications of the a legal case at a similar regulator. A review of Partner processes across the organisation by PWC will adjust many of the risks previously addressed. These listed risks have been re-evaluated and can be considered mostly new or enhanced.

Enforced Partner Contract Changes. PTNR1 /16-b relates to changing the existing Partner contracts to reflect new interpretations of employment law and incurring additional costs.

Ineffective Partner Training. PTNR3 reflects the ability to adequately train all partners supporting their ability to deliver decisions compatible with PSA standards, and to prove the effectiveness of that training.

Recruitment and Retention Issues. PTNR4 reflects some partner roles becoming less attractive (Visitors, which no longer physically visit) for instance, plus small profession or modality groups where limited pools of candidates may cause conflicts of interest.

Poor quality Partner decisions. PTNR5 relates to the quality and accuracy of the work carried out within the regulatory departments which is outside the direct control of the Partners dept.

Partner Diversity pool. PTNR6 risk that the diversity of the partner pool does not match the diversity of those that may be involved in utilising their services, as these are unknowns at the time of partner recruitment and training. Registrant EDI will be compared to Partner EDI as both sets of data become more complete.

Partner Dept workload. PTNR7 reflects the upcoming project work to review the use of Partners as well as the ongoing work to review Partner legal status, on top of business-as-usual operational work.

Regulation

Education

The Education Department has taken the opportunity to expand out the Risk Descriptions, whilst still retaining the Event – Cause – Consequence format. A direct mapping of changes over the year is thus difficult, however general themes can be identified.

Poor Quality regulatory assessments or decision making (a new risk) is an amalgamation of the old risks, Lack of consistency in applying standards; Insufficient checking to support success of new model, and Quality checking insufficient to maintain and improve quality of process application and outcomes. Residual risk was previously 9, and is now 8.

Perception incorrect regulatory decisions made (new), Lack of stakeholder understanding in the model and its application (old) was a new risk in August 2022 and residual risk had not yet been determined. The residual risk is 4 for the new risk, whilst inherent risk was 6 for the new risk and 9 for the old risk.

A further new significant risk, although with an inherent and residual risk of only 4 is Expectations that significant changes needed in all regulatory areas are not managed through regulatory reform, meaning significant changes to education quality assurance model required. This flags alignment with regulatory reform must be maintained by the new model.

Fitness to Practise

FTP Process inefficiencies (FTP1/38) has not seen substantial change over the year although more PSA standards are being met, and costs have risen. Inherent and post mitigation risk are scored as 9 (medium) last year and now, with the improvement programme still running and first two of six phases delivered.

FTP Improvement project failure FTP2 / 39 has seen the residual risk decrease from 12 to 9 over the year, as the second phase of the improvement programme is worked through. Regulatory reform may have an impact, from next financial year.

Workload impact (FTP5 /42) reflects the impact of potential influxes of cases creating further backlogs and the inability to hold remote hearings was previously assessed as having an inherent risk of 9, but is now considered 12, whilst residual risk has increased from 4 to 9.

FTP8 Impact of poorly constrained decisions impacts public protection is a new risk, reflecting the potential impact of employees or partners making incorrect decisions. Requirement for validation or enhanced sign off are being developed.

Registration & CPD

One of the key risks to the organisation, Public Protection by Registration process failure (REG1 / 59) residual risk has decreased over the reporting period, dropping from 12 (Medium / High) to mid level Medium. This dropped further with the publication of the PSA report and further analysis by the Registration Team.

Increased automation and reworking of the cross over between Quality Assurance and internal process checks may enable lowering the risk. Changes to the way Partners are used may change the residual risk although the result has yet to be predicted.

Registration fraud (REG2 / 61) residual risk is unchanged over the year, but increased numbers of applicants are now more closely matched by the resources available to process them.

The potential risks around Registration System failures (REG3/62) has lowered over the year from a Medium/High to a Medium as improved business continuity provision and improved support contracts and internal knowledge have improved.

System interfaces (REG4/63) risk has reduced slightly from Medium/High to Medium with the improved support and internal knowledge of the systems linkages across the organisation.

The roll out of new fee structures when the Fee Rise project is delivered (REG7/66) across professions sequentially tied into renewal cycles and potentially increased frequency of collections for each profession creates a medium/high residual risk, and although theoretically simple, there is a multitude of profession cycles and payment cycles to support. Residual risk has increased from 6 (medium) to 12 (medium / high) as the pressure to complete the more complex project as soon as possible to realise increased revenue continues.

REG12 International Applications processing backlogs have been decreased after using an external supplier to input paper based information into the CRM system to catch up, and online international applications are now the main method of applying. Inherent risk has decreased from 20 to 16, and residual risk decreased from 12 to 6, based on the increased resource and backup methods of operating.

REG13 Reporting reflects the difficulties in reconciling the reports created for different purposes and by different developers with Registration data. Further training of Registration Managers and Team leaders will improve reproducibility and consistency of reports, and residual risk has lowered in the area from 16 to 12 over the year. However, the target risk for this area is 4 indicating more progress is needed to reach acceptable levels.

Capability of employees (REG14) and Partners (REG15) inherent risk, both scored at 20 last year have reduced to 16 and 12 respectively over the year, whilst residual

risk has lowered for both from 16 (Medium/High) to 8 (Medium), with an ongoing requirement for improved frequency of documentation and guidance update for employees and the potential for partner decision appraisal in future.

REG16, Modalities and Annotations relates to historic gaps in information (since before 2001, where registrants failed to supply information following transfer from the professional body to statutory register).

Professional Practise and Insight

Insight & Analytics

I&A1 / 29 Lack of Intelligence gathering and analysis processes. This risk has not decreased over the year but one of the methods of reducing it will be completed by the end of the calendar year, with the creation of a data dictionary, which will enable us to know what should be in databases and what requires amendment before more reliable reporting can be delivered. Appropriate specialist reporting resource is now in place and robust methods of data collection being developed.

I&A2 Impact of Data Accuracy relates to current information in databases where there has not been a systematic approach to data capture and cleansing as issues are identified. This risk has not reduced over the financial year, but the first steps will use the data dictionary being created via the Programme for Data Excellence.

I&A3 Impact of Future data accuracy, relates to the impact of not ensuring current and future data input to systems is correct through lack of automated validation, resulting in an ongoing requirement to undertake data cleaning exercises. This is a new risk, and should be gradually mitigated as the backlog of development work in the Registration System is completed.

Communications

Permanent resourcing continues to be an area of risk (COM1) with the use of Luther Pendragon and internal temporary resource to cope with workload.

With the new Standards of Proficiency being published, there is a slightly increased risk of stakeholders misinterpreting our guidance. A rigorous sign off process is in place with Policy Dept for material designed to be published, and Lines To Take document is already in place. Residual risk has increased from 4 to 6 for the present time.

An organisation wide Tone of Voice document is in preparation to meet any challenges around communication to major stakeholders from the multiple sources we provide. (COM5). (This does not directly influence communication with individual applicant of registrant communications).

One new organisation level risk has recently been added with the software supporting our intranet going end of life. (COM7). We will thus be required to re-engineer our intranet sooner than planned. We have access to a new suite of Microsoft tools, but this had not been planned for this financial year.

Policy & Standards

POL1 / 28 relates to resources within the Policy & Standards team, particularly in light of the potential for additional work around Regulatory Reform. Over the year there has been movement within the department and some shortfalls in resourcing with internal promotions and general staff movement. Inherent (12 > 15) and residual risk (9 > 12) are up compared to a year ago, but it is expected to fall back to the earlier position over time.

Compliance with PSA EDI standards (POL2) has increased following considerable effort of collecting and analysis of registrant data across all professions. Residual risk has reduced from 9 to 6, with further work to be undertaken with FTP data. POL5 is a risk related to ensuring EDI is considered in new policies and initiatives across HCPC, but is outside the direct control of the Strategic Lead on EDI. Inherent and residual risk remain unchanged over the year.

Lack of corporate memory and documentation (POL4) is a new risk added last year with an inherent risk of 9 and residual risk of 6, requiring maintenance of historic and new legal advice over time, which should be easy to support over time. Residual risk remains unchanged currently.

POL6 Advanced Practise agenda, is an area where we are unsure how much influence we could or should endeavour to have, as these are currently out of scope of HCPC regulation.

English language requirements for international applicants (POL7) and Welsh language capabilities at HCPC (POL8) are the subject of newly developed risks that are yet to be fully defined.

Professionalism and Upstream Regulation

This area was formerly included in the Policy & Standards area, so risk have been gradually broken out.

PUSR1 Incorrect understanding of standards documentation by registrants was new a year ago, with an inherent risk of 9 but no residual risk, which has now been determined as 4 which is the target risk. However, new standards of proficiency are about to be published for all professions (Sept 2023) after an updating process so this risk will be tested in the near future.

PUSR2 Strategic relationships with strategic partners incorrectly assigned weight and resource. The risk has an inherent risk of 16 and a residual risk of 12 last year. This has improved to a residual risk of 8, with targeting of priority areas and the assistance of external partners (Luther Pendragon).

PUSR4 Effective Stakeholder engagement, inherent risk has risen from 12 to 16 with patient groups requiring engagement in the near future. Some data may be available via the Education departments analysis, but residual risk remains at 6.

Resources & Performance

Estates & Facilities

In 2022 many of the existing risks were being managed down to their target levels. The risk non-compliance to Fire Safety Regulations (OFS1/80) is currently being managed at the target risk rating with weekly testing schedules and the enhanced number of fire wardens in place to deal with Hybrid working challenges to maintain this level.

Building plant end of life, (maintenance and potential replacement) (OFS2 / 81) is an ongoing risk. As existing equipment becomes older the cost of replacement parts increases and their availability decreases, making total replacement increasingly desirable. The residual risk has been maintained for this year, but is likely to increase without funded replacement.

Failure of Server Room Power Supply / environmental controls (OFS3 / 82) is maintained at a residual risk of 3, and may decrease further as Hybrid working continues and further systems and data are moved to the Cloud, when the Server room will become an internal communications hub.

Inability to process post (OFS4/83) is another risk that has been minimised over the last few years as post has dropped dramatically and scanning and email delivery has increased for inbound and outbound communication. Online applications and renewals have cut the requirement for paper responses to registrants for the most part. Potential failure of the franking machine for outbound post has reduced with the replacement of the old, owned equipment with a leased machine with appropriate support contracts, plus a local post office for use as a stop gap should it be required. Physical security (OFS5/84) continues to be rated Medium / High residual risk, as break-ins have occurred relatively recently. Daytime attempts to enter the building have not been seen very recently but could occur. Reception area training and potentially turnstiles may lower this risk but may make entry and exit of the premises difficult.

Health & Safety (OFS6 /85) residual risk has been maintained at Medium, with scheduled compliance checks in place and the requirement for reporting of incidents (or potential incidents) in the office or at employees home designed to capture issues. Home working guidance is provided via the website and a new Health & Safety risk assessment is scheduled for the next financial year.

Inflationary pressures on cost of office operation (OFS7) has been stabilised at Medium /High but is expected to fall (to Medium) as energy cost control measures such as an updated utilities trading strategy benefits are realised. Energy requirements may be lowered by replacing old heating appliances or installing environmentally friendly on-site generation, however this requires substantial investment.

OFS8 Lack of Sustainability and environmental compliance is a new risk where government targets will push the risk profile on an ongoing basis. We are yet to establish inherent and residual risk in this area, but also have Council and employee

inspired targets. We are already using Net Zero electricity and gas (if still used) by 2028/9. The policy and road map around this risk is under ongoing development.

Finance & Procurement

Old Risk 11, now FIN1 Income System Failures relates to the process of collecting funds from registrants and applicants efficiently, without multiple manual processes. This is dependent on the Business Central (BC) project which has been delayed with a more “out of the box” solution adopted for the first phase. Residual risk remains as last year at 12.

FIN12 relates to poor process documentation which is currently 95% complete. This will need to be substantially revisited once BC nears completion as processes should be significantly simplified.

FIN6 (formerly 90) Accuracy of the Registrant forecast was passed to the Finance dept in 2022, although some of the supporting reporting remains with the CISRO. Residual risk has not changed over the year, but international applications and registrations continue to be a challenge to predict accurately.

FIN7 Payroll issues relates to our having a single point of failure that could be increasingly problematic if Payroll is completely insourced. Experienced HR colleagues act as back up for this process at present and the residual risk of 12 is expected to reduce with more trained individuals in Finance and support from HR. FIN8 is a further new risk where it is highlighted that a monthly payment date of the 20th potentially means that an employee could leave subsequent to receiving the full monthly salary and owe HCPC for up to 10 days salary. This currently has a residual risk of 6 which could be lowered if payments were made at the end of the month. Various mechanisms of claw back are in place currently.

Information Technology

IT7 / 53 Successful Cyber Security Attack, pre mitigation impact has been increased from 4 to 5 pushing the inherent risk up to 15, whilst the post mitigation risk is still 8. Gradual roll out of the E5 next year following delays due to BC project, but move away from on premise IT kit and network drives seen as a way of using Microsoft's / Azure expertise to protect our information.

IT6 Remote working data loss, remains unchanged with inherent risk of 12 and post mitigation risk of 6, but this area is difficult to constrain as we are unable to control the physical environment under which employees work outside the offices.

IT1 Data Retention reflects the concern the retention schedule is not being robustly implemented within departments, and Heads of Department do not realise their responsibilities. Inherent risk remains at 12 whilst residual risk has increased from 6 to 12. Long term move to Azure with built in automated retention / destruction schedule will improve this risk.

IT2 Failure to manage User Permissions relates to the access to data and systems across the organisation. Inherent risk has fallen from 15 to 12, but residual risk has

increased from 5 to 8 with the recognition that third party suppliers have access to our data periodically for projects and bug fixing.

IT8, Lack of Spare Capacity is a new risk still being fully developed. It is illustrated by the delay on implementing the E5 security systems and processes across the organisation due to the delay of the BC project, which has consumed the available technical resources.

Human Resources

HRD1 / 18E Recruitment has changed focus, this was formerly focused on the costs of recruiting replacement employees in need of training to bring them up to speed, now focuses on recruiting quality candidates and the impact of established, trained employees moving around the organisation leaving gaps to be filled. The earlier version of this risk had an inherent risk of 12 and a residual risk of 9. The updated risk carries the same inherent risk but the residual risk is 9, the higher end of medium.

Limited career development opportunities (HRD2 / 19) has been addressed via a new organisation succession plan which provides career opportunities with residual risk falling from 12 to 9. Apprenticeships have been awarded in Policy, Finance and Insight & Analytics.

HRD6, Retention of employees is a new specific risk where the impact on quality of service HCPC can provide, and the costs of recruiting and training new employees is seen. Retention has improved 23% to 16% with a requirement for potential job description changes and social media positive stories to attract and retain staff.

Business Change

Project Department Resourcing Limitations, PBC2/71 inherent risk has decreased from 12 to 9 over the year, as the design of the team was changed and residual risk lowered from 12 to 4 as posts were filled by external appointment or internal moves. Lack of an Integrated Financial System, PBC3 / 72 inherent risk has dropped from 4 to 2, reflecting greater confidence in the existing systems, and residual risk has similarly lowered from 4 to 2 as the existing methods are working. Future integration to Business Central is still an aim for the Business Change team.

No Project Backfill Budgeting; PBC4 / 73 inherent risk has reduced from Medium / High (12) to medium (9), and individual projects now determine their backfill requirements. Residual risk has lowered from 12 to 4 (medium/low).

Lack of Clear and Consistent Communication; PBC5 / 74, inherent risk has dropped from 9 to 3 as the corporate strategy, and its impact on projects has become better defined. The Business Change team is now deeply involved in the corporate planning process and residual risk is also lowered to 3.

Lack of Benefit Analysis and Tracking; PBC6 / 75 following a benefits realisation workshop with BDO, inherent risk has lowered from 8 to 6 and residual risk is at 4. This is at the target risk level.

Ineffective Adoption of Agile Methodologies; PBC7 / 76 inherent risk has seen no change but post mitigation risk has reduced from 6 to 4 as the whole team has been trained on Agile methodologies.

Project Governance Reduction; PBC8 / 77, the introduction of the Change and Benefits forum designed to act as a gateway for projects provides a mechanism for projects to be appropriately initiated, whilst minimising management overhead. Residual risk has lowered from 6 to 4.

Poor change management; PBC9 / 80, inherent risk has been lowered from 12 to 8, and residual risk lowered to 4 as updated tracking and processes have been implemented via the Change and Benefits forum.

Several new risk have been added including ; Supplier stability during a recession (PBC10), Future expiration of the IBM support contract (PBC11), single points of failure (PBC15) and Change Management risk to production(PBC15).

Executive Leadership Team

(ELT1,2,3) reflect risk that the changes in ELT and various interim or backfilling activities over the last 10 months could impact the delivery of Council objectives, or the culture of the organisation. Risk of siloed working being increased by remote working of many employees.

Concerns about the High rate of change have decreased since last August (ELT4) with residual risk lowering from 12 to 9, this potentially realising the braking effect of more robust upfront benefits realisation mechanisms and robust planning protocols. ELT9 (formerly 10 & 87) Patient safety is around not delivering business as usual operations for a variety of potential reasons, residual risk remains at 9 but the risk owner has moved from the QA Lead to the ELT.

A risk around the quality of the data the reporting mechanisms interrogate in our three core databases (ELT10), information security (integrity of data) has been added with the Programme for data excellence seen as a mechanism for gradual improvement in this area. Much of this is dependent on various validation on data input controls that need to be developed. This has a residual risk of 9.

ETL11 & 12 relate to funding of the organisation. 11 is specifically around the Partner worker status case. Provisions have been made. This remains at 9. 12 relates to achieving the fee rises required to allow us to sustain operations and fund future improvements in services and processes. Residual risk on this is 12, as we must continuously ensure we bring our stakeholders with us when proposing fee rises. Delays have been incurred in the current fee rise process but a prudent budgetary approach means we have not assumed the impact of the fee rise in the current financial year.

ELT13 Failure to respond to Regulatory reform in a timely manner is also a new risk, which includes the impacts of insufficient funding to progress work at sufficient rate and quality to enable HCPC to successfully implement the changes required across systems and processes.

HCPC Operational Risk Register

August / September 2023
Governance Department

HCPC Operational Risk Register

- Communications
- Education
- Executive Leadership Team
- Finance & Procurement
- FTP
- Governance
- HR
- Information & Cyber Security (includes DR/BCM)
- Insight & Analytics
- IT
- Office Services
- Partners
- Policy & Standards, EDI matters
- Professionalism & Upstream Regulation
- Projects & Business Change
- Quality Assurance
- Registration & CPD
- Risk Profiles
- Rolling Update plan
- Reference Data



Department - Sept 2023	Low 1-2	Low/ Medium 3-5	Medium 6-10	Medium / High 11-15	High 16-25
Governance					
Information Governance & Security	0	3	6	0	0
Complaints	0	0	0	0	0
Quality Assurance	0	1	3	0	0
Governance	0	1	7	0	0
Partners (moved)	0	0	5	3	0
Professional Practise and Insight					
Insight and Analytics	0	1	2	0	0
Policy and Strategic Relationships	0	0	4	1	0
Communication	0	0	6	1	0
Professionalism, and Upstream Regulation	0	1	4	0	0
Regulation					
Education	0	6	6	0	0
Fitness to Practise	0	0	8	0	0
Registration & CPD	0	2	11	4	0
Resources & Performance					
Estates & Facilities	1	2	2	2	0
Finance & Procurement	0	3	3	2	0
Information Technology	0	0	5	2	0
Human Resources	0	1	4	1	0
Business Change	4	10	1	1	0
Executive Leadership Team	0	0	11	3	0
TOTAL RISKS	5	31	88	20	0

Department - June 2023	Low 1-2	Low/ Medium 3-5	Medium 6-10	Medium / High 11-15	High 16-25
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Information Governance & Security	0	3	5	0	0
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Governance	0	0	7	0	0
Professional Practise and Insight					
Insight and Analytics	0	0	2	0	0
Policy and Strategic Relationships	0	0	4	1	0
Communication	0	0	6	0	0
Professionalism, Partners and Upstream Reg	0	1	4	0	0
Regulation					
Education	0	2	6	0	0
Fitness to Practise	0	0	7	0	0
Registration & CPD	0	1	6	9	0
Resources & Performance					
Estates & Facilities	1	2	2	2	0
Finance & Procurement	0	3	3	2	0
Information Technology	0	0	5	2	0
Human Resources	0	1	5	2	0
Business Change	2	8	0	1	0
Executive Leadership Team	0	0	8	1	0
TOTAL RISKS	3	23	71	20	0

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22 COM1	Strategy	Communications Strategy not Aligning with the Corporate Strategy	Communications not aligning with the corporate strategy will affect communications effectiveness.	Communications	Executive Director of Governance Assurance & Planning	3	3	9	Mitigate	Very regular touch points & engagement between those involved; Comms Team, Policy team, Exec, Luther & Chair. Regular meetings between CER, Exec Dir & Luther Annual Comms plan developed between Luther & HCPC Comms	Exec Dir PPI Comms Lead	Ongoing	3	2	6	May/June 2023+Q2:Q6	5		Review of divn of response required from external support long term, but up for discussion. Some perm recruitment on hold until new Exec Dir in place.	Ann rvw usually gets Exec Dir input, so new year planning
23 COM2	Strategy	Communications Department Resourcing Limitations	Communications Department resourcing issues will impact communication quality and responsiveness which will mean Council and ELT requirements are not met due to the Communications Department not having the required staffing numbers or range of skills.	Communications	Executive Director of Governance Assurance & Planning	3	3	9	Mitigate	Team engagement Still small dept, will require ongoing use of external support (Luther). Not currently recruiting. x2 vac, x2 temps short term	Exec Dir PPI & Comms Team Lead	Ongoing	3	3	9	Aug/Sept 2023	8		Filling vacant post will lower risk in future. May be decrease in Luther funding and increase inhouse resourcing	Addn of 1 FTE would lower to Unlikely, 2 to highly unlikely. Engagement group notified in advance
24 COM3	Operations	Digital Service Accessibility Issues	The rollout of the digitisation strategy for all interactions with registrants, partners and the public will impact service quality and stakeholder satisfaction due to specific stakeholder groups user experience and potentially accessibility issues. Pace of change may impact UX without procurement controls requirement for AAA compliance adhering to updated Digital Strategy.	Communications	Executive Director of Governance, Assurance and Planning & Executive Director of Resources & Bus Performance	3	3	9	Mitigate	New Digital Officer post in place full-time to focus on user experience on website and supporting UX as digitisation strategy moves forward. (Currently part working on general Comms support due to ongoing resource issues) Website hubs in place to support good UX - registrants, employers, education providers, students. Digital best practice and optimisation of website resources, however digitisation of portal front ends to business systems is less optimized. UX principles collected at recent inhouse workshop - North Star vision.	Comms Team Lead	Ongoing	3	3	9	Aug/Sept 2023	6		UX workshop held with users & employees, to produce vision of what Digital access should aim for.	websites not mobile friendly; more user friendly at design phase
25 COM4	Reputation	Practise of Information and advice Issues	Inaccurate information and advice being provided to stakeholders will affect the reputation of HCPC due to the dynamic nature of the information and the multiple sources providing it.	Communications /Policy	Executive Director of Governance Assurance & Planning	2	3	6	Mitigate	Processes in place for responding to policy queries. Regular engagement between communications and policy teams and colleagues across the business to ensure responses are accurate. LTT document in place, currently revising policy response sign off process complete with escalation routes. Comms Business Partner with Policy Team. Social Media queries via DM.s Soc Med etc, used Teams channel to answer questions from stkhldrs. Informal sign off that response is appropriate.	Head of Policy Digital & Comms Lead	Ongoing	2	3	6	Aug/Sept 2023	3		More frequent reviews to lower post mitigation risk. New standards being rolled out, project to look at content for 1st Sept 2023	Any PSA impact? Missing FTE, has some impact. Redeployments currently build risk.

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26 COM5	Reputation	Immature Reputational Communications Management	Inconsistent or inappropriate organisational communications will impact the reputation of HCPC due to the processes for managing proactive, reputational communications being immature. [Excludes individual applicant/registrant communications]	Communications / Policy	Executive Director of Governance Assurance & Planning	3	3	9	Mitigate	External Comms agency in place to manage risk, Regular and close engagement between external agency, internal comms team and policy team. Forward plan aligned to strategy and shared weekly with CEO and Chair. Relationship Mgmt OCCE team. CRM system when finances allow. EMG meets monthly to cover stkhld engagement. Relationship mgmt for prof bodies, time intensive, but inconsistent results due to time pressures. New Stakeholder newsletter from Adam 4 prof bodies.	Executive Director of Governance Assurance & Planning	Ongoing	3	2	6	Aug/Sept 2023	4		Org wide Tone of Voice doc to be rolled out to whole HCPC.	Tone of voice, stakeholder comms may be excluded? What is in Policy/Upstream? Secondment of other regulator FTE's experts to revise FTP. Rvw Reg process docs as previous;y
27 COM6	Reputation	Lack of Clarity of Communications Responsibilities	Duplicate, inconsistent or inappropriate communications will impact the reputation of HCPC due to a lack of clarity in the division of communications responsibilities between the Communications Department and other departments	Communications	Executive Director of Governance Assurance & Planning	3	4	12	Mitigate	Communications team transitioning to Business Partner approach to ensure effective engagement across all departments. Communications team sole team responsible for mass sending out of communications to registrants and employers; website and social media content. Oversight of departmental templates ongoing, to minimise own goals Weekly Comms planning process, creating ongoing schedule of content	Comms Team Lead	Ongoing	3	3	9	Aug/Sept 2023	6			Still working through existing templates etc Still down 1 FTE, may build into an impact in future.
COM7 new June21/2023		Impact of intranet software loss	Lack of development of the FLEX software solution for the organisation intranet leads to loss of functionality and potential withdrawal of software due to contractual issues.	Communications & IT	Executive Director of Governance Assurance & Planning	4	5	20	Mitigate	Trial use of latest Microsoft products to deliver a modern intranet	Hd of IT & Digital & Comms	Ongoing	3	4	12	Aug/Sept 2023		Testing possible solutions but not in workplans for this year. (IT & Coms)	Aging software solution - could lose search functionality	

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	Public Protection	Poor quality regulatory assessments or decision making	Event - We undertake poor quality assessments / make poor quality decisions / apply inconsistent outcomes Cause - Processes and assurance mechanisms are not sufficient, or not applied as intended Consequence - Providers / programmes are approved / not approved incorrectly. More resources that necessary are used to assess providers / programmes. We do not detect failing providers / programmes	Education	Head of Education	4	3	12	Mitigate	1. Quality check development activities 2. Outcomes of quality check reporting 3. Continued assessment of the model, through regular reporting 4. Existing continuous improvement structures 5. Establishment of regulation continuous improvement framework	1. HoE 2. HoE / EMs 3. HoE / ELT / ETC 4. HoE / EMs 5. EDoR / HoE	1. September 2023 2. Ongoing 3. Ongoing 4. Ongoing 5. March 2024	4	2	8	Sep-23	8	Minimal		
	Reputation	Perception incorrect regulatory decisions made	Event - We make a correct decision within our regulatory remit, but there is external perception that the decision is incorrect, or too light / heavy touch Cause - We have not sufficiently explained our regulatory remit, or the reason(s) the decision was made Consequence - Undermined confidence in all decisions made, which could be worsened by cumulative events	Education	Head of Education	3	2	6	Mitigate	1. Understanding of stakeholder views, through existing feedback mechanisms 2. Delivery of regional engagement Dept project 3. Existing continuous improvement structures 4. Establishment of regulation continuous improvement framework	1. HoE 2. KK 3. HoE / EMs 4. EDoR / HoE	1. Ongoing 2. September 2023 3. Ongoing 4. March 2024	2	2	4	Sep-23	2	Measured		
	Public Protection	Team resourcing leads to inability to deliver assessments to time and / or quality	Event - We do not have sufficient internal resources to deliver operational assessment and / or crucial supporting activities (for example, regional engagement, producing / acting on insight from data) to time and / or quality Cause - Unexpected staff changes, inability to quickly fill vacancies, poor planning for expected assessment and / or supporting activities, poor engagement with the sector to identify potential spikes in activity, underinvestment in education due to internal perception of impact of education activities Consequence - Public protection and reputational – Programmes are not	Education	Head of Education	3	4	12	Mitigate	1. Develop succession planning 2. Regular review and understanding of expected assessment activities 3. Delivery of regional engagement Dept project 4. Line management of team to ensure case load effectively managed	1. HoE / HR 2. EMs 3. KK 4. EMs	1. tbc 2. Ongoing 3. September 2023 4. Ongoing	3	3	9	Sep-23	6	Measured		
	Public Protection	Partner resourcing leads to inability to deliver assessments to time and / or quality	Event - We do not have sufficient partner resource to deliver operational assessment to time Cause - Unexpected changes to our partner list, inability to quickly fill partner vacancies, poor planning for expected assessment activities, poor engagement with the sector to identify potential spikes in activity Consequence - Public protection and reputational – Programmes are not reviewed in time for start dates, meaning negative impact on workforce. We do not pick up issues through monitoring in a timely manner, leading to unsuitable individuals entering the Register. negative feedback leading to a loss of stakeholder confidence in our work	Education	Head of Education	3	3	9	Mitigate	1. Regular succession planning with partner team 2. Regular review and understanding of expected assessment activities 3. Delivery of regional engagement Dept project 4. Central partner review and actions	1. EMs / Partners 2. EMs 3. KK 4. BC	1. Ongoing 2. Ongoing 3. September 2023 4. tbc	3	2	6	Sep-23	6	Measured		
	Reputation	Non-delivery of commitments made when developing / scaling up the model	Event - We do not meet commitments made, such as reducing burden for providers where this is appropriate, while making engagement more meaningful, establishing strategic relationships and information sharing arrangements, incentivising providers to maintain and improve regulatory performance Cause - Time / resource / financial underinvestment in delivering on commitments	Education	Head of Education	1	3	3	Mitigate	1. Continued assessment of the model, through regular reporting 2. Existing continuous improvement structures 3. Continuous improvement development (regulation)	1. HoE / ELT / ETC 2. HoE / EMs 3. EDoR / HoE	1. Ongoing 2. Ongoing 3. March 2024	1	3	3	Sep-23	2	Measured		

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	Public Protection	Reliance on the skills and knowledge of existing staff (not documented systems / processes) means we are not able to deliver intentions of the model, regular supporting products, and continuous improvements	Event - We do not deliver regular supporting products and continuous improvement activities, which are integral for the good running of the model Cause - Staffing changes mean we do not have expertise within the team to ensure model principles are being applied as intended, deliver updates to provider performance data, report team performance to ELT / ETC / Council, or drive forward improvements and expectations for the team / stakeholders Consequence - Over time and unnoticed, the model stops functioning as it should, meaning providers / programmes are approved / not approved incorrectly, or inconsistent application of the model. Quality of governance reporting, and performance captured through that reporting, drops . Loss of stakeholder confidence in our work	Education	Head of Education	3	4	12	Mitigate	1. Develop succession planning 2. Document undocumented processes / ways of working 3. Deliver automated reporting 4. Deliver automated education provider performance data solution	1. HoE / HR 2. HoE 3. BC / I&A / IT / HoE 4. BC / I&A / IT / HoE	1. tbc 2. March 2024 3. 2024-25 FY (earliest) 4. 2024-25 FY (earliest)	3	2	6	Sep-23	6	Measured		
	Public Protection	Good performance against KPIs is not sustained long term	Event - Performance against our KPIs does not sufficiently improve now we have delivered the 2021-22 academic year backlog, providing a poor stakeholder experience Cause - Team is not sufficiently skilled or resourced to deliver against KPIs. KPIs are unrealistic Consequence - Public protection and reputational – Programmes are not reviewed in time for start dates, meaning negative impact on workforce. We do not pick up issues through monitoring in a timely manner, leading to unsuitable individuals entering the Register. Stakeholder confidence in the model is undermined, along with confidence we will deliver on future commitments . The team is burned out by continued pressure, and a sense we are not able to manage the expected level of operational activity	Education	Head of Education	3	3	9	Mitigate	1. Develop succession planning 2. Regular review and understanding of expected assessment activities 3. Review of service levels and KPIs 4. Line management of team to ensure case load effectively managed	1. HoE / HR 2. EMs 3. HoE / EMs 4. EMs	1. tbc 2. Ongoing 3. Dec 2023 4. Ongoing	3	2	6	Sep-23	6	Measured		
	Public Protection	System services become misaligned with business processes	Event - Education system products are not developed in synergy with continuous improvement developments Cause - Consideration of whether and how requirements may be delivered not built into continuous improvement work. Business change / IT team(s) not sufficiently skilled or resourced to deliver requirements. Development structures ill defined, immature, and untested Consequence - Changed business processes not being applied as required, due to new requirements / controls not being included within systems, which impacts on the quality of progress application and outcomes. Unable to deliver continuous improvements. Divergence of process and supporting systems, leading to workarounds creating inefficiencies	Business Change / Education	Head of Education / Head of Business Change	2	4	8	Mitigate / transfer	1. Continued engagement with Business change 2. Further definition and documentation of structures and ways of working 3. Measuring success of BC work	1. HoE 2. HoE / BC 3. BC	1. Ongoing 2. tbc 3. tbc	2	3	6	Sep-23	6	Open		

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	Public Protection	Continuous improvement leads to divergence from model principles	Event - Continuous improvements significantly change how we apply the model Cause - Model principles not sufficiently considered in continuous improvement activities, or activities driven by other internal change Consequence - Developmental change becomes fundamental change, which could cause change fatigue (we have committed to not making significant change), and causes confusion for the team / external stakeholders in how the model is applied	Education	Head of Education	2	3	6	Mitigate / transfer	1. Establishment of regulation continuous improvement framework	1. EDoR / HoE	1. March 2024	2	2	4	Sep-23	4 Open			
	Public Protection	Expectations that significant changes needed in all regulatory areas are not managed through regulatory reform, meaning significant changes to education	Event - Education quality assurance model is incongruous with legislation delivered through regulatory reform Cause - Lack of influence over development of legislation. Misreading of proposals Consequence - Significant change required to model, leading to disruptive change to stakeholders. Regulatory reform restricts what we can do, meaning we cannot effectively undertake our work	Education	Head of Education	4	1	4	Accept	1. Continued Education involvement in development	1. HoE / HoPS	1. tbc with DHSC timeframes	4	1	4	Sep-23	4 Open			
	Reputation	We lose the education PSA standard	Event - PSA analysis shows we no longer meet standard 9 Cause - The model / how we are performing shows that we do not have a proportionate and transparent mechanism for assuring ourselves that educational providers and programmes are delivering learners who meet the SOPs and SCPEs. We do not take action where assurance activities identify concerns either about training or wider patient safety concerns Consequence - Reputational – losing the standard would mean our requirements setting would become more difficult	Education	Head of Education	2	2	4	Accept	1. Consideration of focused areas from previous PSA review 2. Continued assessment of the model, through regular reporting 3. Existing continuous improvement structures	1. HoE / HoQA 2. HoE 3. HoE	1. tbc 2. Ongoing 3. Ongoing	2	2	4	Sep-23	4 Minimal			
	Public Protection	SCPEs implementation planning does not leave adequate time to enable providers to plan for and make changes to meet the effective date	Event - Providers do not begin delivering the revised SCPEs from September 2024 Cause - The revised SCPEs are not finalised and made available to providers to enable the time required for implementation (Policy-owned cause) and / or Education-led implementation activities to support, enable, and assess providers delivering the SCPEs are not properly planned and / or delivered as required Consequence - The revised SCPEs are not	Education / Policy	Head of Education / Head of Policy	5	3	15	Mitigate / transfer	1. Standards development 2. Implementation planning 3. Implementation delivery	1. HoPS 2. HoPS / HoE 3. HoE	1. October 2023 2. August 2023 3. October / November 2023	5	1	5	Sep-23	5 Minimal			

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1 ELT1	Strategy	Leadership Consistency	Inconsistent or changing leadership across the organisation could impact the delivery of key organisational objectives due to the lack of a defined leadership strategy and consistent leadership behaviours.	ELT	Chief Executive	4	4	16	Mitigate	People strategy Corporate plans & dept workplans, Values & behaviours work across organisation. Full ELT & SLT in place. ELT members reviewed annually. Weekly ELT onsite meetings. Reappointment of Chair supports stability, T3 leadership training.	Chief Executive	In place	3	4	12	Aug/Sept 2023	6		Recruit into posts ASAP	360 degree rvws may imprtve impact, embred behav framwk, in annual perf rvw. T3 programme. Interim CEO whilst recruitment proceeds, combined with lack of Exec Dir Policy Upstream areas and acting up in FTP increases risk	
2 ELT2	Strategy	Relationship with Council	Delivery of Council objectives may be delayed due to Council & ELT interpreting requirements differently and not being on the same page.	ELT	Chief Executive	3	3	9	Mitigate	Corporate plan & strategy to ensure understanding, priority, key council member 1:1's and Chair CEO. Regular review of corporate plan deliverables to monitor progress. Mix of face to face and online Council & committee meetings. Increased pre meeting discussion of papers between authors and members as required. Office of Chair & CEO now in place.	Chief Executive	In place	2>3	3>2	6	Aug/Sept 2023	4			Certain amount of challenge between ELT & Council required for mgmt to operate. Inductions, Office of Chair & CEO will assist in future. New members in place getting used to HCPC processes.	
3 ELT3	Strategy	Poor Organisational Culture	Organisational culture issues, poor staff behaviours and a lack of accountability and ownership will impact the delivery of key organisational objectives due to embedded siloed working across the organisation.	ELT	Chief Executive	4	4	16	Mitigate	Corporate plan & values, people strategy, behaviour framework, compassionate regulator, established wider leadership group ELT, SLT, etc People Straegy in place / in process of impltn. Remote working less company relationship maintained.	Chief Executive	In place	3	3	9	Aug/Sept 2023	6		People Strat ongoing devpmt	Flux in ELT/SLG may increase uncertainty across org. Not yet incr to likely (4)	
4 ELT4	Strategy	High Rate of Change	Too many projects will impact the delivery of key organisational objectives due to the rate of change across HCPC being too great for the organisation's capacity and capability. (Organisations capacity to meet level of change required to carry out projects, pace of change, and will create an impact on employees)	ELT	Chief Executive	4	4	16	Mitigate	Regular review of corporate plan delivery & prioritisation in light of resources available. ELT oversight of major progress changes, Project Team to support initiatives. Change control programme started. Business Change and Benefits realisation monitoring, corporate planning to control rate of change to match organisation capacity. Ensure workload is not excessive matching required pace.	Chief Executive	In place	3	3	9	Aug/Sept 2023	9>6		Benefits forum	Working collaboratively with corp plan investment proposals. Project completion needs to be monitored	
5 ELT5	Strategy	External Relationship Management	Duplicate, inconsistent or inappropriate or lack of communications will impact HCPC's ability to influence the wider health environment due to poor management of external facing relationships and interim central stakeholder management system.	ELT	Chief Executive	5>4	4	16	Mitigate	EStablished Stakeholder engagement group, planning contacts, briefings, quality checked, target groups and levels an contact. Horizon scanning. Monthly strategy & planning by ELT, incl horizon scanning, stakeholder engagement incl oversight by Luther. Stakeholder mapping, Relationship Mgrs for key stakeholders, engagement plan for Chair & CEO using OneNote	Chief Executive	In place	3	3	9	Aug/Sept 2023	6		Relationship mgmt system effectiveness, and search for potential improv	Prof Prac & Insight disrupted, so leadership not consistent. Better relationship with Chair & CEO	
6 ELT6	Strategy	ELT Capacity Issues & succession planning	Inadequate succession plan in place to avoid key staff departures impacts organisational resilience and loss of corporate memory; or rapid rise in required expertise or capacity result in Single point of failure, or failure to respond to statutory or new requirements in an appropriate timescale.	ELT	Chief Executive	4	4	16	Mitigate	Established a broader leadership group and heads of service roles as part of people strategy. Leadership dev programme in place. Strategy & Planning sessions ongoing. ELT & SLT notice periods. Design & purpose of ELT & SLG not determined through T3 process. Peer challenge at ELT.	Chief Executive	Ongoing	2>3	3	9	Aug/Sept 2023	4		Once all ELT & SLT rolls filled, with FTE's should lower risk. Corporate and Dept level succession plans	Level of resp not defined very accurately, level of authority of Heads to be better defined is required.	

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7 ELT7	Strategy	Lack of Effective Horizon Scanning	An inability to predict and respond to future requirements with appropriate prioritisation will impact the effectiveness of business planning due to a lack of horizon scanning to identify emerging issues and opportunities.	ELT	Chief Executive	4	4	16	Mitigate	Monthly strategy & planning by ELT, incl horizon scanning, stakeholder engagement incl oversight by Luther, Public Affairs, Intell sharing across regulators, forward planning, people strat etc, Strat Stakeholders mgmt	Chief Executive	Ongoing	3	3	9	Aug/Sept 2023	9		More control on what we are doing, but are we doing the right "stuff"?	
8 ELT8	Strategy	Lack of Succession Planning	Single points of failure and inadequate corporate memory will affect organisational resilience due to weaknesses in succession planning, knowledge sharing and process documentation.	ELT	Chief Executive	4	3	12	Mitigate	Address single points of failure in organisational design, handover periods between interim & permanent positions wherever possible. HR workforce planning, Leadership Dev programme, Change control.	Chief Executive	Ongoing	3	3	9	Aug/Sept 2023	6	Corp plan suucc plng update.	Low to medium currently. Issue identified as SPF was caused by another issue Lack of documentation on ongoing work/future work in some areas.	
10 & 87 ELT9	Patient safety	Failure to deliver BAU functions compliant with standards and quality requirements.	Difficulty in recruiting appropriately diverse & qualified resource impacts how BAU functions are resourced and controlled to deliver the appropriate KPI results, impacting public protection, HCPC's reputation and delivery of operational requirements to provide sufficient registrants for patient safety.	ELT	QA Lead > ELT	4	4	16	Mitigate	QA activity in Regulatory departments extended beyond pure PSA compliance. Dept workplans, monthly performance monitoring of BAU by ELT incl financial performance. KPI monitored at ELT & Council. Quarterly FTP reviews in 2022/23. Reg & Edu performance monitored at ETC. Improved ARAC reporting highlights any areas of concern, providing greater accountability.	Chief Executive	Ongoing	3	3	9	Aug/Sept 2023	6	ETC meets Chair & produces feedback loop.	Merged old risks to be more encompassing of approach. Difficult to reach stability and environment is changing in the background, PSA may still be down on 3 FTP stds, ongoing impact	
New ELT10	Information security (integrity of data)	Effort required & Low confidence in reporting data.	Accurate analysis and manual extraction processes of reporting data, and amount of effort required to provide confidence in those reports impacts reliability and usability of reporting functions. (data quality needs improvement, input controls required and automated extraction processes)			4	4	16	Mitigate	Programme for Data Excellence developing automated reporting, temp officer working on Data Dictionary, Mandatory validated fields in all new projects, integrity of reg data reporting, assignemnt of data ownership.		End 2023-24	3	3	9	Aug/Sept 2023		I&A reporting training from I&A team, when data dictionary is in place.		
New ELT11	Finance & Operations	Changes to Partner contracts places unsupportable burden on finances	Outcome of NMC case on Partner Worker status may place an unfunded burden on HCPC's financial and organisational resources,			4	4	16	Mitigate	Working group, Draft contract in place, PWC as is & future status, Develop a project to develop major proj PTNR worker status, lead by Exec Dir. Provision of substantial amount for use in next years resolution of the ptnr matter (pymts to past work)		Dec-23	3	3	9	Aug/Sept 2023				
New ELT12	Finance	Failure of sustainable funding	Required level of proposed and future increased funding obtained through proposed fee rises are not delivered on time or at a reduced amount placing an unsustainable financial burden on HCPC, resulting in being unable to deliver regulatory functions			5	5	25	Mitigate	Very close working relationship with DHSC officials, and home country governments, extensive consultation with stakeholders including unions and professional bodies. Proposed fee rise input not included in budget calculation, balanced budget to bring down cost base, international income, onward plan for fee rises.	ELT	Ongoing	3	4	12	Aug/Sept 2023				

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New ELT13	Operations	Failure to respond to Regulatory reform in a timely manner	Regulatory reform cannot be delivered in the proposed time scale due to funding, and timing constraints restricting the pace and quality of work to be undertaken.			4	4	16	Mitigate	Close engagement with DHSC, Policy & Standards holding working relationship with DHSC at initial stages of project, Costs associated with programme of work required being developed by Deputy Interim CEO, existing fee rise proposal to help fund required work.	ELT		4	3	12	Aug/Sept 2023				
New ELT14	Reputation	Tone of Voice project - failure to deliver	Tone of Voice project fails to deliver required changes within the regulatory departments in the timescale required resulting in the perception of HCPC being a less compassionate regulator and not regaining outstanding PSA standard 18.			4	3	12	Mitigate	The review of all templates and information sheets is on track to conclude by the end of September 2023. This is a revised timeline as the project was initially expected to complete in Q4 2022-23 but we are on track against this. This will be followed by tone of voice training for all team members.		01/10/2023	3	2	6	Aug/Sept 2023	4			

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11 FIN1	Finance	Income System Failures	Process failures and accounting errors will impact the service delivered to registrants and lead to financial losses due to the new Income System not meeting business requirements and requiring multiple manual supporting processes.	Finance and Procurement	Head of Finance	5	5	25	Mitigate	BC Reimplementation bids received from KPMG and Cognizant. Additional expertise will be sought to support supplier selection process with Gartner's help, who are market intelligence company with experience within the IT sector. Project Board has been set up, as per Exec Dir of Resources & Bus Performance instructions. Includes Kayleigh and Paul (Projects Team), Geoff Kirk (IT), etc.Reduced customisation (out of the box solution in package 1)	Head of Finance	Dec-23	4	3	12	Aug/Sept 2023	5		Data Migration element of project is in house.	KPMG awarded via CCS framework Mod Oct start, finish by end of FY; Early July go live predicted	
12 FIN2	Finance	Poor Finance Process Documentation	Process failures and accounting errors will impact the service delivered to registrants and lead to financial losses due to current finance processes not being fully documented and there being an over-reliance on specific staff's process knowledge.	Finance and Procurement	Head of Finance	5	5	25	Mitigate	Walk-through videos, guidance notes and handover material has been produced and will be incorporated within our detailed month-end timetable with covers assigned to mitigate instances that task owners are not available. Process Docs. BC processes and training will produce an requirement for train the trainer to roll out to rest of organisation.	Head of Finance	95% complete	2	2	4	Aug/Sept 2023	4		BC training will be required plus new documentation	95% complete	
13 FIN3	Finance	Finance Department Resourcing Limitations	Process failures and accounting errors will impact the service delivered to registrants and lead to financial losses due to there being too few permanent staff to operate finance processes effectively and a reliance on temporary staff who do not have sufficient process knowledge. RISK ON HOLD WHILE AWAITING BC Project implementation.	Finance and Procurement	Head of Finance	5	3	15	Mitigate	we have recruited for most, if not all, required posts including Senior Finance BP, Systems Accountant, Payroll Manager, Procurement Manager and Senior Transactions Analyst. Additional roles have been created for a Project Finances Lead to address the need for Finance to maintain a project accounting function and also a Finance Ops Manager, who will be the key contact between us and the Reg Ops Team, to ensure accurate and up-to-date transactions are being recorded. The recently appointed Financial Controller has, unfortunately, handed in their notice due to a family emergency abroad. We are aiming to recruit an Interim Financial Controller to get us through year-end and audit and are also recruiting for the permanent position in parallel.	Head of Finance	May-22	3	3	9	Aug/Sept 2023	L		May need one temp back fill for BC implementation	Few departures, not back filled to free up cash for BC base roles that are in s/hort supply. Apprentice from BPP, post grad position.	
14 FIN4	Strategy	Operational Improvement Delays	The Finance Team failing to expand their skills will affect the progress of operational improvements due to ongoing system, process and resourcing issues meaning the team has no time to undertake training.	Finance and Procurement	Head of Finance	4	3	12	Mitigate	Finance Improvement Plan will be produced for each of the key finance functions including Finance Transactions, Financial Controls, Management Reporting and Procurement. As per the previous update, the Systems Accountant has been tasked with producing the as-is process maps and the corresponding SOPs to identify potential efficiencies as well as prep us for the requirements gathering phase of the BC Reimplementation project.	Head of Finance	Sep-23	3	3	9	Aug/Sept 2023	5		Finance Systems Admin to look after BC data	BC Train the trainer, later in the FY Trng Budget not used, due to lack of time	
15 FIN5	Operations	Vendor Management Immaturity	Vendor contracts and agreements not fully meeting HCPC requirements will affect vendor service quality and HCPC vendor costs due to the immaturity of the vendor management processes.	Finance and Procurement	Head of Finance	3	4>3	9	Mitigate	New PMgr in place, vendor mgmt will become part of BAU, KPI's & compliance monitoring to be put in place. Updated procurement policy, tracking compliance etc (Contract list to be reviewed periodically by ELT, prior to renewals) Vendor Mgmt in BC, plus Vendor Bus Ptnr in place. Proc Mgr & support via	Procurement Manager	Apr-23	2	2	4	Aug/Sept 2023	4			As part of ISO27001 Monthly monitoring with Tariq	

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90 FIN6	Operations	Accuracy of registrant forecast	Registrant forecast is too simplistic and relies on variable quality external data sources in a volatile external environment for required accuracy, leading to potential incorrect projections of registrant numbers.	Finance and Procurement	Head of Finance	3	3	9	Mitigate	Internal working group and external support from BDO to examine model mechanics and analysis of other regulators inputs and outputs. New support in Fin Dept, FP&A Mgr, Taking a longer term view.	Head of Finance	Summer 2022	3	2	6	Aug/Sept 2023	4	Minimal Measured Open Seeks	Moving Ref Forecast to Finance with advisory board to provide data and insight.	New risk being addressed by external support
FIN7	Operations	Payroll Issues	The Payroll process has a single point of failure; internal resource running without longterm back up in place, which will be increased if the service is brought back in house without adequate resourcing and cover.	Finance and Procurement	Head of Finance	4	3	12	Mitigate	Additional cover internally or go back to original supplier with support of Payroll experienced HR team.	Head of Finance		4	3	12	Aug/Sept 2023	5	Minimal Measured Open Seeks	Train up more team members as back up. Payroll & Procurement audit, IFRS 35	Approx Oct 2023 roll out date
FIN8	Operations	Payroll timing	Employee pay dates of 20th or earlier in any month, potentially allows those leaving without sufficient notice to receive 10 days salary that they are not entitled to.	Finance and Procurement	Head of Finance	3	2	6	Mitigate	Email and phone contact with those that have been overpaid for return of funds. Yammer notification of timing if leaving. Legal requests for repayment if required. Outstanding, untaken holiday leave may absorb some of the overpayment.	Head of Finance		3	2	6	Aug/Sept 2023	5	Minimal Measured Open Seeks		

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38 FTP1	Operations	FTP Process Inefficiencies	Inefficiencies in the FTP process will affect the delivery of organisational objectives due to FTP being a large percentage of HCPC's spend and FTP volumes and costs increasing.	FTP	Head of Fitness to Practice	3	3	9	Mitigate	1. FTP improvement programme still running, (Nexus phase 2 sprint in place, (Completed) 4 more to go). Online concerns form to be delivered by QTR3.	Head of Fitness to Practise	01/05/2023	3	3	9	Aug/Sept 2023	6		List of potential inefficiencies in systems and process?	Mitigation roll out underway	
39 FTP2	Operations	FTP Improvement Project Failure	Failure of the FTP Improvement Programme will impact the effectiveness of existing FTP processes and limit the capacity and capability to deliver ongoing FTP improvements due to the Programme being too complex or allocated budgets being exceeded.	FTP	Head of Fitness to Practice	4	3	12	Mitigate	2nd phase of FTP improvement programme ongoing, monitor on an ongoing basis. Need for review of future changes, priorities of project in light of latest PSA report. Also in light of Reg Reform.	Head of Fitness to Practise	31/12/2023	4	2	8	Aug/Sept 2023	4			When delivered full project, also await PSA audit findings	
40 FTP3	Public Protection	FTP Case Errors	A FTP case incorrectly or not being progressed or proven will impact public protection and the reputation of HCPC due to FTP process failures or poor FTP decision making.	FTP	Head of Fitness to Practice	4	2	8	Mitigate	1/ FTP improvement programme 2/ Ongoing quality assurance activities 3/DAG & DRG, Partner Trng	Head of Fitness to Practise	31/12/2023	4	2	8	Aug/Sept 2023	5			Always some risk	
41 FTP4	Public Protection	FTP Disputes	A FTP case being successfully challenged by the PSA will impact public protection and the reputation of HCPC. (due to disagreements between the PSA and HCPC in how policies and standards should be applied.)	FTP	Head of Fitness to Practice	4	2	8	Mitigate	1/ FTP improvement programme 2/ Ongoing quality assurance activities 3/DAG & DRG, Partner Trng 4/Additional legal providers	Head of Fitness to Practise	31/12/2023	4	2	8	Aug/Sept 2023	5		Only 2 HCPC challenges, about same as other regulators i. Decision making std backn 22/23	Always some risk. Current Final Hearing case being considered by PSA.	
42 FTP5	Public Protection	Workload Impact	The FTP case backlog becoming unsustainable due to insufficient workforce to cover an influx of cases will impact public protection and the reputation of HCPC if hearings cannot be held remotely and department responsiveness is impacted by planning uncertainty.	FTP	Head of Fitness to Practice	3	3>4	12	Mitigate	1) FTP improvement programme 3) Seeking permanent Rules change to allow remote hearings 5) Forecasting based on trend monitoring, incoming complaints 6) Increased headcount in all areas this FY 7) Monthly case load monitoring in each area. 8) Capacity issues can be addressed by an existing overflow arrangement in external provider contracts (complete outsourcing of some cases) 9) Backlog growing in Investigations being addressed	Head of Fitness to Practise	Started from 31/12/2021	2>3	2>3	9	Aug/Sept 2023	4		Rolling recruitment and succession planning in new year.	As low as likely to go	
56 FTP6	Reputation	Ineffective Whistleblowing Processes (external issues)	Failure to identify and respond to issues will impact the reputation of HCPC and the level of service delivered to stakeholders due to ineffective external whistleblowing processes. (Make co wide risk, incl Policy, Stakeholders, Prof liaison etc.) Consider moving?	FTP	Head of FTP	3	3	9	Mitigate	FTP standard response to raised concerns Emerging concerns group, intell sharing on location, Regulator based. Employer engagement concerns via Prof & Upstream. Dev rptg to highlight workplace hotspots for FTP. Nexus phase 2 includes whistleblowing.	Head of FTP / ELT?	Current	3	3	9	May/June 2023	5		More to do on reporting, internal guidance on Whistleblowing	Internal & externa whistleblowing split out	

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FTP7	Operations	Capability	FTP / HCPTS Partners poor quality / appropriate decisions. NOT RESOLVED AT THIS POINT	FTP	Head of FTP	TBD	TBD			Need to establish requirement for a governance process, or determine if not required due to Partner employment status Partners have recently been removed due to incorrect interpretation of the law. PRC oversight, PWC			3	2	6	May/June 2023				
FTP8 10/07/2023 3 New			Decision making and reasoning by Partners or HCPC/HCPTS employees may fail to protect the public.	FTP	Head of FTP	4	2	8	Mitigate	Recruit,ent proc trng 4 staff & Ptnrs, DAG, QA, DRG checks. Built in sign off process, elevated sign off routes if appropriate.			4	2	8					

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43 GOV1	Operations	Unclear Corporate Reporting Responsibilities	Ineffective corporate reporting will impact the reputation of HCPC and cause performance assessment issues due to reporting responsibilities not being clearly defined.	Governance	Exec Dir of Governance, Assurance & Planning	3	4	12	Mitigate	Monthly Dir reporting to ELT, redefined KPI's for Council, capability of analysis to be determined. Council & Committee reporting well defined. Exec Dir of Resources & Bus Perf started. Annual Report working group meets weekly, ARAC oversight; PSA coordination, liaison provided by QA Lead. Code of Corporate Governance, Committees report to council on matters considered each year. CEO induction critical to implementing a robust change over. OCCE will provide dedicated support to this process, to be reviewed by interested parties.	Exec Dir of Governance, Assurance & Planning; OCCE	Current	3	3	9	Aug/Sept 2023	4		Exec Dir Bus Perf to PRC on regular basis, Nov PRC. ELT Terms of Ref 2B rvwd Data Quality auditing/ assurance. Improv to Finance System to ease Fin rptg. Council member inductions, Comm members change	Data quality, data extraction issues, HR expert has left, ongoing ownership questions, increased complexity. Evaluate reporting frequency, should it match Council/Committee deadlines
47 GOV3	Governance	Council Effectiveness	The quality of Council decision making will impact the ability of HCPC to plan and achieve its objectives due to the Council not receiving adequate information, not having time to review all options and not having the correct range of skills and training.	Governance	Head of Governance and Deputy Registrar	4	4	16	Mitigate	Governance and ELT oversight, guidance, set cover sheet, internal and external review. Skills matrix for members, gap analysis, regular Council seminars, policy issues, risk appetite, succession planning, regular perf revw, including 360, members perf and review, undertake e-Learning as employees, agenda planning with Chair & Hd of Gov, monitoring of Council time. In depth member inductions for Council members. Review of Council effectiveness 2023/24 (Being supported at required levels by stretching resources)	ED of GAP, (Head of Governance when in place)	Current	3	3	9	Aug/Sept 2023	6		Rvw paper writing guidance, improved EDI guidance for paper writers. - On hold. Council Dev plan. Council effectiveness review Oct /Nov2023	Many last minute updates from some departments causing late adjustments to agenda items and potentially sign off. Lack of time to QA papers before progressing to council level. Positive feedback on inductions (Jan 20023)
49 GOV4	Operations	Lack of Engagement with QA	Lack of engagement with the QA team will impact the level of compliance to team policies and processes due to the QA team's recommendations not been taken on board in a consistent manner. Ownership and delivery of agreed recommendations not maintained.	Governance	Head of AC	3	3	9	Mitigate	Governance and ELT oversight, guidance, set cover sheet, internal and external review. Skills matrix for members, gap analysis, regular Council seminars, policy issues, risk appetite, succession planning, regular perf revw, including 360, members perf and review, undertake e-Learning as employees, agenda planning with Chair & Hd of Gov, monitoring of Council time. In depth member inductions for Council members. Review of Council effectiveness 2023/24	Head of AC	Current	3	2	6	Aug/Sept 2023	4		Rvw approach to recommendations, rptg on status of business rules, cross dept business rqmnts, tracking improv impact (attending all 3 priorit mtgs)	Still a risk. Going back to check processes for second time, concentrating on high risk areas, which are lagging slightly. Building more robust 1st line assurance.
50 GOV5	Reputation	Non-adherence to the Code of Corporate Governance	Council members not adhering to the code of corporate governance will impact the reputation of HCPC	Governance	Exec Dir of Governance, Assurance & Planning	5	3	15	Mitigate	(Being supported at required levels by stretching resources)	Exec Dir of Governance, Assurance & Planning	Current	3	2	6	Aug/Sept 2023	6		Rvw Sch of delegation coming Yr, Review Code of Corp Gov next FY (2023/4)	Annual refresh of conflict of interest forms for end of year audit. Terms of Ref 4 committees. Code of Corp Gov ToR,

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86 GOV6	Reputation	Ineffective Whistleblowing Processes (internal)	Failure to identify and respond to issues will impact the reputation of HCPC and the level of service delivered to stakeholders due to ineffective internal whistleblowing processes.	Governance	Exec Dir of Governance, Assurance & Planning	4	3	12	Mitigate	Promotion of internal whistleblowing process and annual training on anti-bribery and fraud. Incidents would be reported to ARAC.	CISRO	Current	3	3>2	6	Aug/Sept 2023	6	Minimal Measured Open Seeks	Repromote process. Induction inclusion, AF&AB&Whistleblowing split out. Merge AF & AB & Whistleblowing?	Internal & external whistleblowing split out. Merge AF & AB & Whistleblowing?
GOV7	Governance	Submission of FOI or SAR requests to disrupt HCPC	Governance processes used to disrupt the organisation due to abuse of FOI & SAR systems in a vexatious manner by those unhappy with regulatory decisions. Significant & Complex cases can be difficult to manage.	Governance	Exec Dir of Governance, Assurance & Planning	3	3	9		Vexatious policy in some circumstances. Some multiple requests by apparent different parties cannot be mitigated unless material publish to website. Cross train additional employees to carryout FOI & SAR requests.	CISRO / InfoGov Mgr	Ongoing	3	2	6	Aug/Sept 2023	4	Minimal Measured Open Seeks	Vexatious complaints process to be reviewed. All employee meeting content	Increased loading of SAR's & FOI req inot Sec inbox
GOV8	Governance	GAP team spread too thin	New roles across the existing GAP team will lead to potential risk of over stretched resources in the short term, whilst full time governance team are not in place.	Governance	Exec Dir of Governance, Assurance & Planning	4	4	16		Existing Gov roles working across Council & Committees will continue to support existing processes whilst developing new roles	ED of GAP	Q3	3	2	6	Aug/Sept 2023	2	Minimal Measured Open Seeks	Full cross training where applicable	
GOV9	Governance	CCEO Resources	Resources of CCEO dept insufficient to manage requirements, with some existing resource unavailable.	Governance	Exec Dir of Governance, Assurance & Planning	3	3	9		Upskill existing team members. Robust induction, to ensure roles locations are visible	BM CCEO	TBD	TBD	TBD	6	Aug/Sept 2023	5	Minimal Measured Open Seeks		

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18-E HRD1	Operations	Recruitment	An inability to recruit quality candidates in a competitive job market. Or impact of internal movement deprives some functions of trained employees creating new vacancies.	HR and OD	Head of Human Resources	3	4	12	Mitigate	People Strategy which has direct focus on developing the employer brand, recruitment strategies and retention completed. Focus on behaviours, aligning these through APDR and employee engagement. Robust onboarding to prevent dishonest employees starting. Upgrade project for recruitment portal, to proceed, 8 week time scale once initiated. Will deliver into Google etc Total Jobs or Reed automatically. Only cv & supporting letter required, and trigger questions relating to qualifications.	Head of Human Resources	Ongoing	3	2>3	9	Aug/Sept 2023	6		Develop internal talent pool, live feeds, employee stories etc. Enhance employer brand, long term project. Upskill existing HR team.	BBC undercover journalist scenario; should be picked up by Vetting & Barring checks, and background checks. Temps checked in on site for 3 months or more.
19 HRD2	Operations	Limited Career Development Opportunities	Limited career development opportunities will affect employee churn rates and employee wellbeing and lead to single points of failure due to a lack of effective succession planning and unclear career paths.	HR and OD	Head of Human Resources	3	4	12	Mitigate	Develop a new organisational Succession plan which focuses on career development opportunities. In progress. L&D programmes about to roll out; x30 internal candidates progressed in careers at HCPC. Apprentices in I&A, Policy, Finance to start or started. Aspiring Leaders launched, Mgmt Dev prog in 2023/4.	Head of Human Resources	Ongoing	3	3	9	Aug/Sept 2023	6		Formal succession plan data collection with Heads of, by end of FY 2022/23 Succession planning workshop at Sept SLG. Current skills vs addnl rqmt for training to allow stepping up to new job.	Awaiting Succession plans, apprenticeships, workforce plan roll out. 16% turnover currently, internal movers = 6 this qtr, ext appt = 16
20 HRD3	Operations	Increased Flexible Working Requests	Requests for greater levels of flexible working by staff will have financial impacts on HCPC and make resource planning more complex due to all staff experiencing more flexible working arrangements during the COVID-19 pandemic.	HR and OD	Head of Human Resources	2	4	8	Mitigate	Develop a New ways of working Policy in collaboration with Corporate Services. Awaiting survey - 3rd Oct, to support decision on type of hybrid working. Review in May 2023 to Council, estate updates, policy changes, how depts have adapted DSC checks. No complaints yet. All different approaches, dept level one day in office reqmt.	Head of Human Resources	Ongoing	2	3	6	Aug/Sept 2023	4		Rvwrd in light of proposed legislation, Employee Forum rwd existing 80% in home/ 20% in office etc. Would be contractual change for true Flexible working. Cost impact to be determined when detail known.	Hybrid working, team, reconfigure office, more collaborative. Resourced at home but can also work at home, policy to support this activity. SLG discussion on Hybrid working July 2023.

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21 HRD4	Operations	Staff Morale Issues	Low levels of employee morale will affect employee wellbeing and churn rates and reduce the level of service delivered by HCPC due to a poor perception of HCPC amongst employees, a high level of organisational change and increasing job demands.	HR and OD	Head of Human Resources	3	4	12	Mitigate	The new ways of working policy along with the introduction of an employee engagement strategy will enhance employee morale. For example, employees will be asked to participate in identifying behaviours for all HCPC values. Workshops from Nov 2021. Pulse survey, seem happy with hybrid working, organisational aims, recommend HCPC as employer, and exit intvws. One day employee session on Pulse Survey results (June 2023).	Head of Human Resources	Ongoing	2	2	4	Aug/Sept 2023	4		Team specific, eg Reg & FTP teams have onsite requirements. Standard Operating Hours. Try to make approach more uniform as to nos of days in office. Reconfig rqrd.	People being heard in workshops. Sept Hybrid working survey on how it works, 1/4 moral surveys. Latest Pulse survey (Hybrid working in place) mix of well being elements in place, improving. Qly monitoring.
HRD5	Operations	Failure or withdrawal of payroll services	Payroll supplier insourcing may result in adverse effects on employees remuneration.	HR and OD	Head of Human Resources	4	4	16	Mitigate	Contractual controls on termination of services on both side of contract. Testing back office rules of CoreHR functionality to fit HCPC as possible solution. June/July 2023, inboarding following HealthCheck by CoreHR, plus inhouse training. Ongoing rotating support of HR on a monthly basis.	Head of Human Resources; Head of Finance	Ongoing	4	3	12	Aug/Sept 2023	8		Bring payroll in house, contract in place until 2024 as back up.	Quite dependant on single part time employee, with HR as final back up. No dependancy on Sage/BC. Matching maternity, leave, etc calculations to UK statutory reqimts. Approx Sept 2023 go live currently.
HRD6	Operations	Retention of employees	Lack of retention of employees will lead to higher training and churn costs and reduce the quality of service delivered by HCPC due to a competitive job market and a poor perception of HCPC amongst employees.	HR and OD	Head of Human Resources	4	3	12	Mitigate	Hybrid working approach is more flexible than other employers, allowing more home working, less office based. Still dependant on Temps, need to plan ahead and resource up at peak times. Pay award & Hybrid working stabilized turnover, lowering training rqmt. Reverse mentoring scheme starting this year.	Head of Human Resources	Ongoing	4	2	8	Aug/Sept 2023	8		Workforce planning and JD adjustment, job design. BC & FTP & Fin roles difficult to replace. Adding positive stories photos etc to social media etc.	Retention improving 23%, > 16%. Potential impact of Temps leaving hits moral in those depts with higher turnover (Reg & FTP)
HRD7		Border Agency changes impact overall costs of employment	Border Agency sponsorship licence threshold lowers base salary requirement to include all roles at HCPC, potentially creating potential for costly employees on low base salary.		Hd of HR										Aug/Sept 2023				Public perception risk, cost to registrant fees, quality of internal recruitment process, diversity of lower paid employees. Lack of confidence in our recruitment process.	

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44 ICS1	Information Security	Information Security Policies Not Being Followed	Information security breaches will impact the confidentiality, integrity and availability of HCPC and stakeholder data due to staff not following information security policies for data handling, redaction and encryption.	Governance	CISRO	C = 4 I = 4 A = 4	C = 4 I = 4 A = 4	C = 16 I = 16 A = 16	Mitigate	Reporting culture to see where not following requirements leads to incidents, and custom mitigations for specific areas.	CISRO / Ex Dir of Governance Assurance & Planning	Current	C = 3 I = 3 A = 3	C = 2 I = 2 A = 2	C = 6 I = 6 A = 6	Aug/Sept 2023	C=5 I=5 A=5	Minimal		
45 ICS2	Information Security	Poor Data Management by Suppliers	Poor data management by suppliers will impact the confidentiality, integrity and availability of HCPC and stakeholder data due to a lack of monitoring of supplier's compliance to HCPC data management policies.	Governance	CISRO	C = 2 I = 2 A = 2	C = 4 I = 4 A = 4	C = 8 I = 8 A = 8	Mitigate	Robust contracts and minimum certification requirements, to lower likelihood of breaches.	CISRO / Procurement	Current	C = 2 I = 2 A = 2	C = 2 I = 2 A = 2	C = 4 I = 4 A = 4	Aug/Sept 2023	C=3 I=3 A=3	Minimal		
48 ICS3	Information Security	Lack of Information Security Awareness	Information security incidents will impact the confidentiality, integrity and availability of HCPC and stakeholder data due to a lack of information security awareness across all levels of the organisation.	Governance	CISRO	C = 2 I = 2 A = 2	C = 4 I = 4 A = 4	C = 8 I = 8 A = 8	Mitigate	Annual employee, Partner and temporary worker infosec training plus ongoing intranet/Teams messaging on current issues to heighten awareness	CISRO	Current	C = 2 I = 2 A = 2	C = 2 I = 2 A = 2	C = 4 I = 4 A = 4	Aug/Sept 2023	C=3 I=3 A=3	Minimal		
ICS4	Information Security	Lack of Information Security response	Alerts to incidents outside business hours will not be addressed immediately resulting in heightened risk to the confidentiality, integrity and availability of HCPC information.	Governance	CISRO; Head of IT	C = 3 I = 3 A = 3	C = 3 I = 3 A = 3	C = 9 I = 9 A = 9	Tolerate (current, should mitigate)	Increase automated monitoring and response mechanisms, or provision SoC	Head of IT / CISRO	Unknown	C = 3 I = 3 A = 3	C = 3 I = 3 A = 3	C = 9 I = 9 A = 9	Aug/Sept 2023	C=2 I=5 A=5	Minimal		
ICS5	Information Security	Incomplete automated defences	Wide scale automated defence mechanisms have not been installed, leaving some vulnerabilities in place.	Governance	CISRO; Head of IT	C = 4 I = 4 A = 4	C = 4 I = 4 A = 4	C = 16 I = 16 A = 16	Tolerate (current, should mitigate)	Upgrade existing provision from E3 to E5 Microsoft offering	Head of IT / CISRO	Dec-23	C = 3 I = 3 A = 3	C = 2>3 I = 2>3 A = 2>3	C = 9 I = 9 A = 9	Aug/Sept 2023	C=3 I=3 A=3	Minimal		
88 ICS6	Information Security	Information security	Failure to provide sufficient resources to protect the organisation and its data from cyber risk lead to increased business and financial risk	ELT	Exec Dir of Resources	C = 4 I = 4 A = 4	C = 4 I = 4 A = 4	C = 16 I = 16 A = 16	Mitigate	Provide just enough funding for above basic protection at all times.	Exec Dir of Resources Head of IT / CISRO	Unknown	C = 3 I = 3 A = 3	C = 2 I = 2 A = 2	C = 6 I = 6 A = 6	Aug/Sept 2023	C=5 I=5 A=5	Minimal		
ICS7	Governance / Information Security	Information security certification loss	Failure to successfully migrate from ISO27001:2013 to ISO27001:2022, leads to loss of certification	ISMS Board	CISRO	C = 3 I = 3 A = 3	C = 3 I = 3 A = 3	C = 9 I = 9 A = 9	Mitigate	Two year project to update processes and documentation commenced Nov 2022	CISRO	Mar-25	C=2 I=2 A=2	C=3.5 I=3.5 A=3.5	C=7 I=7 A=7	Aug/Sept 2023	C=5 I=5 A=5	Minimal		
ICS8	Information Security	Insecure applicant or registrant credential use	Users of the HCPC portals use personal email accounts and passwords that are shared with other services, that have subsequently been breached and credentials been sold or shared on the dark web.		CISRO; Head of IT	C = 2 I = 2 A = 1	C = 3 I = 3 A = 3	C = 6 I = 6 A = 3	Tolerate (current, should mitigate)	Two factor authentication should provide sufficient protection, although partial details may be compromised.	Head of IT / CISRO	Ongoing	C = 2 I = 2 A = 2	C = 2 I = 2 A = 2	C = 4 I = 4 A = 4	Aug/Sept 2023	C = 2 I = 2 A = 2	Minimal	Token theft, where users have been validated through MFA, are used to gain access to system.	
ICS9	Information Security	Emerging threats not mitigated	Solutions in place may not provide protection against the latest threats; Rapid change of threats beyond our ability to mitigate; IT Systems cannot support rapid change;	ISMS Board	CISRO; Head of IT	C = 4 I = 4 A = 4	C = 4 I = 4 A = 4	C = 16 I = 16 A = 16	Mitigate	Continuous monitoring of industry trends, attend cyber conferences, and focusing on Microsoft stack offerings to protect mostly Microsoft IT stack.	Head of IT / CISRO	Ongoing	C = 4 I = 4 A = 4	C = 2 I = 2 A = 2	C = 8 I = 8 A = 8	Aug/Sept 2023	C=5 I=5 A=5	Minimal		

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29 I&A1	Operations	Lack of Intelligence Gathering and Analysis Processes	A lack of coordinated intelligence gathering and analysis will impact the reputation of HCPC due to appropriate expertise only recently being recruited and the associated processes still being developed. Organisational level deficit of protocols and processes for describing, capturing, compiling, analysing and sharing data.	Insight & Analytics	Exec Dir of Governance, Assurance & Planning	3	4	12	Mitigate	I&I Framework delivery plan in development, report to Council. Alternative task specific data platform being developed to improve data quality and accessibility and hence enable priority analyses via Programme for Data Excellence - Funded to end 2022/3 FY. PDE, funding to end Dec2023 for 1FTE eval data dictionary content	Head of IT & Head of Insight & Analytics	Feb/Mar 2023	3	2	6	Aug/Sept 2023	3	Data Standards Officer; Azure Data Science Virtual Machine	Sept21 authorised, Sept22 updated to Council, updated I&A framework, FTP work is increasing as automation increases in FTP processes.	
I&A2	Operations	Impact of Data accuracy	A historic lack of processes and reporting mechanisms for the systematic checking of data quality, and/or of actions to correct issues at source both in the data and in the collection of those data, will impact on the reputation of HCPC. At present work often any corrective action is only on the analysis set for the job in hand, rather than at source or in a reporting dataset where these changes are fixed.	Insight & Analytics	Exec Dir of Governance, Assurance & Planning	3	5	15	Mitigate	Through first tranches of the Programme for Data Excellence: Develop systematic approach to identification and documentation of data quality issues. Develop collaborative approach to addressing data quality issues, including consideration of correction at source. Data Quality Risks being documented, meeting held.	Head of Insight & Analytics	Feb/Mar 2023	2	3	6	Aug/Sept 2023	4	Data Standards Officer; Data Q ricks need to be monitored - where	Progressing	
I&A3	Operations	Impact of future Data accuracy	Data quality (current & future) is the greatest threat to meaningful intelligence, as validation must be in place to prevent future data errors.	Insight & Analytics	Exec Dir of Governance, Assurance & Planning	3	5	15	Mitigate	Data Standards Brd, in place but may not deliver all requirements expected. Known holes in validation in backlog for Reg System dev	Hd of Reg; Hd of Edu; Hd of FTP	Ongoing	3	3	9	Aug/Sept 2023	4		Difficulties with Backlog in backlog!	

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53 IT7	Information Security	Successful Cyber Security Attack	A successful cyber security attack will impact the confidentiality, integrity and availability of HCPC systems and data	IT	Head of IT & Digital Transformation	4>5	3	15	Mitigate	Combination of ISO27001 & Cyber Essentials Plus to maintain minimal level of control as a baseline E5 roll out in coming year but deployment extended. Audit actions from BDO	Head of IT, Head of Governance	31/03/2024	4	2	8	Aug/Sept 2023	6		Gradual move away from G drive to Sharepoint / Azure. BDO Audit report, reqmnts being implnt'd. E5, to be rolled out over next financial year 23/24	Incr pre mit impact to 5, 20230623. Flag delay to E5 rollout due to BC proj	
IT6	Information Security	Remote Working data loss	Employee and member remote working leads to data risk loss which cannot be prevented by traditional approaches	IT	Head of IT & Digital and CISRO	4	3	12	Mitigate	Introduce automated controls around data loss prevention (IT) Ensure all staff and members are trained & understand their responsibilities (Gov) E5 agreed from Jan 2023; DLP etc Target end March 2024	Head of IT & DT Head of Gov	30/06/2023	3	2	6	Aug/Sept 2023	6>4		Azure DLP, categorise docs and track & delete if outside controlled area. This Financial yr (E5) DPL etc, impl plan over next 12 months at least	ShREPOINT IN FUTURE?	
IT1	Information Security	Data Retention	Failure to manage data in accordance with agreed data retention policies	IT/Business	Head of IT & Digital and CISRO	4	4	16	Mitigate	1/ FTP improvement programme 2/ Ongoing quality assurance activities 3/DAG & DRG, Partner Trng	Head of IT & DT, Head of Governance, Information Asset Owners	31/03/2024	3>4	2>3	12	Aug/Sept 2023	6		Long term sharepoint migration from G drives with a major project proposed for 2023/24 Information owners need to understand their role. Sharepoint migration will require all data owning departments to apply meta data or tags to allow finding data in future.	Asset owners probably do not understand their role? Gov focus! 365 need to check if retention is still applied on emails eg 2 yr deletion. Sharepoint project possible next FY	
IT2	Information Security	User Permissions	Failure to manage user permissions appropriately	IT	Head of IT & Digital	4	3	12	Mitigate	Ensure robust processes for starters, leavers & changers (IT/HR) Ensure priveledged accounts are tightly controlled (IT) Actively manage 3rd party access, rescinding all access not managed via IT team (IT)	Head of IT & DT Head of HR	30/09/2022	4	2	8	Aug/Sept 2023	5>6		Enhancing starter, leavers & changed role processes & third party access to systems less well known/used. Protection against suppliers accessing systems or data without our oversight and knowledge	HR & Fiannce external control. Starters & Leavers okay, Priv mgmt ok now. Contractors still issue, third party suppliers control difficult where data stored off site eg CoreHR	
IT3	Operations	IT Supplier failure	Key IT supplier fails to provide expected service.	IT	Head of IT & Digital, Head of Finance	4	3	12	Mitigate	Ensure procurement process assesses financial, technical and service competence(IT/Proc) Establish escrow arrangements where appropriate (IT) Actively manage suppliers' technical and service level performance (IT) Monitor financial standing of key suppliers (Proc)	Head of IT&DT Head of Finance	30/12/2023	4	3	12	Aug/Sept 2023	8>6		Still working on agrmt with supplier London Escrow or NCC. Future eval of Sliced Bread	Includes financial failure of suppliers; non functional reqmnts around procurement. ESCROW doesn't work easily with Cloud - Sliced Bread needs to be available for FTP so bespoke ESCROW being developed REDACT IN PUBLIC VERSION	

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IT4	Operations	ITDR arrangements	IT disaster recovery and resilience arrangements to not work as expected	IT	Head of IT&DT	5	3	15	Mitigate	Review ITDR arrangements in light of new ways of working (IT) Undertake regular testing of individual components, and of overall response (IT) Ensure dept business continuity plans include provisions for how to continue essential services without IT (Gov)	Head of IT&DT Head of Gov	31/03/2023	3>4	2	8	Aug/Sept 2023	6		Sage to be replaced with Business Central	Buid in to current project process. SLG BIA workshop in next 3 months.
IT5	Operations	IT skills, capacity and resources	Failure to ensure that sufficient IT & Digital skills, capacity, processes and resources with clarity on responsibilities, are in place to meet organisational expectations, manage InfoSec threats and deliver the corporate plan.	IT	Head of IT&DT	4	4	16	Mitigate	Update the DT Strategy to provide an agreed roadmap for technology requirements and how these will be met. Review team structure and roles. Undertake benchmarking against peers and best practices. Dig Strat to be signed off next week. Reskill IT team and potentially restructure, skills gap across HCPC	Head of IT&DT	31/03/2023	3	4>3	9	Aug/Sept 2023	4		Eval Dig skills across HCPC, not all in IT, eg Comms, L&D impacy et.	Technicaly competent with current needs, but on going training AZURE capacity 25% increase in org, but getting 2 jnr rolls, loosing 1 snr.
IT8? NEW		Lack of spare capacity	Capacity to absorb additional projects is limited by a lack of spare capacity within IT or ELT?	ELT	Head of IT&DT						ELT				Aug/Sept 2023					

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80 OFS1	Operations	Non-compliance to Fire Safety Regulations	Non compliance to fire safety regulations will increase the risk of a fire leading to a building being destroyed or being unavailable for a significant period of time due to buildings requiring a range of remedial work to achieve compliance to evolving fire safety regulations.	Office Services	Head of Estates and Facilities Management	4	1	4	Mitigate	Service & Maintenance contracts in place for related systems and services; regular audit of H&S; employee training, building signage, monitored alarms systems, emergency lighting, regular fire evacuation tests (outside pandemic conditions). Weekly testing of audible alarm systems and intercom systems (plus lift). GCC included as leaseholders to HCPC, ensure Fire Warden & First Aiders are in place within GCC.	Facilities Manager	Scheduled compliance testing, and systems already implemented	4	1	4	Aug/Sept 2023	4		Cannot be lowered without significant cost and business change. Risk being managed effectively. At target.	
81 OFS2	Operations	Building Plant End of Life	Building plant failures and non compliance to standards will affect office availability and the quality of the office environment due to equipment such as boilers, air conditioning and lifts reaching end of life and requiring replacement. Due to stock limits, increased cost of holding stock, availability of spare parts; becoming increasingly difficult for older assets, making continued use more costly and difficult.	Office Services	Head of Estates and Facilities Management	3>4	3>4	16	Mitigate	Planned preventative maintenance contracts in place; reactive maintenance as required until funding for replacement plant is available. End of Life for some systems to be defined more closely, cost & timing. Ongoing monitoring of existing equip, monitoring what could be in budget as replacement items in future.	Head of Estates and Facilities Management	PPM scheduled, Reactive beyond budget with ELT approval	3	2	6	Aug/Sept 2023	4		Look at sustainability of existing kit, earlier replacement and potential to switch energy source (gas to electricity) at same time.	
82 OFS3	Operations	Failure of Server Room Power Supply / environmental controls.	Failure of the power supply to the server room will impact the availability of IT systems due to the failover power supply only being tested once every 5 years. Air conditioning units also reaching end of life due to continuous operation, requiring continuous monitoring of performance.	Office Services	Head of Estates and Facilities Management	3	2	6	Mitigate	Diverse redundant power routing to main server room, with automated fail over. Minimum 5 year fixed power testing in place, UPS in place to allow elegant automated shut down of servers, aircon to server room on fail over power also. Interim steps to mitigate. Three units are cycled to produce greater resilience as two units generally required for satisfactory control. Enhanced maint argmt for critical equip & emergency call out if required.	Facilities Manager	In place.	3	1	3	Aug/Sept 2023	3		Purpose built Comms room as opposed to server room, raised flooring, less dependance on hardware in house (cloud adoption).	
83 OFS4	Operations	Inability to Process Post	Inability to process departmental post will affect the delivery of services to stakeholders due to HCPC offices not being accessible or equipment such as scanners not being available. Includes impact of industrial action.	Office Services	Head of Estates and Facilities Management	2	2	4	Mitigate	Franking machine replaced by leased equipment with support contract and maintenance, Potential reduction in post requirement long term as Digital first strategy delivers more services online. Special Delivery items posted via local Post Office in Kennington. Much reduced use of traditional paper mail in HCPC, in and out of office.	Facilities Manager (plus Dept heads)	In place, digital first strategy underway but difficult to predict impact on postal requirement at present.	1	2	2	Aug/Sept 2023	4		Internal Audit of Dept collection of post (incoming) Rqmt for depts to collect and process post. Hand full of items post pandemic. Very low outbound postal use, leased equip, lowers cost & space. Back up line installed to post room.	

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84 OFS5	Operations	Physical Security	Inability to provide adequate physical security for the protection of onsite individuals and organisational assets	Office Services	Head of Estates and Facilities Management	4	4	16	Mitigate	Physical and digital security systems and measures are in place supported by service, maintenance and monitoring contracts. Physical Hearings hosted 184/186, with required risk assessments for specific cases.	Facilities Manager	In place, additional provisions or extensions of services will be made for any prevailing situation	4	3	12	Aug/Sept 2023	6		Turnstile options, additional training and process being considered. Or improve CCTV coverage in vulnerable areas	SER85 SER88 Possible external audit on phys sec
85 OFS6	Operations	Health and Safety	Non compliance with health and safety regulations increases risk of personal harm or injury, including specific risks for vulnerable persons in office or whilst working at home (Hybrid working)..	Office Services	Head of Estates and Facilities Management	4	4	16	Mitigate	Service & Maintenance contracts in place for related systems and services; regular audit of H&S; employee training, building signage, regular monitoring and planning for compliance with any adjustments to regulations; new H&S risk assessment in next FY. Cleaning contracts provide enhanced hygiene and adequate access. Guidance on home working on website.	Facilities Manager	Scheduled compliance testing, and systems already implemented	4	2	8	Aug/Sept 2023	6			
OFS7	Operations	Inflationary pressures on cost of office operation.	Projected financial resources are insufficient to maintain heating and lighting required for safe and compliant operation of the buildings resulting in unfunded pressures due to utility costs. Stock availability may be reduced due to cost of suppliers holding stock in warehouses decreases availability, replaced by ordering direct to site with longer lead times for repair. Economic stability may influence £ purchase power (energy wholesale is in US\$) Electricity, maint contracts inflation, Nat LvgWage impact on cleaning & security costs.	Office Services	Head of Estates and Facilities Management	4	4	16	Mitigate	Factor in fuel costs and other inflationary factors to OFS budget and reforecasting. Implement CCS suggested controls. Governamnt price cap on energy costs, established utilities trading strategy. Migrating on to adjusted future cost & pymt model via CCS, extended time frames.	Head of Estates and Facilities Management & Head of Finance & Procurement		4	4	16	Aug/Sept 2023	10		Replace heating systems for more efficient systems. New Framework agreements (Enviro factors) even if not lowering costs. Onsite generation (solar etc) but heavy investment rqrd.	Global power costs reducing, but time lag in costs coming through to commercial rates
OFS8 NEW		Lack of Sustainability & Environmental compliance	Sustainability compliance complying with gvmt and HCPC internal targets meeting the requirements of an environmental mgmt system					0		Environmental Greenhouse gas emissions via gas & electricity; potential solar/pv projects; working with other regulators to produce a common approach, highlighting our advantage as we own our buildings. Sustainability road map being developed with targets, via external consultants. Carbon Reduction Targets.	Head of Estates and Facilities Management & Head of Finance & Procurement				0	Aug/Sept 2023			Net Zero 2028/9 Gas & Elec target to be agreed (Elec already in place from April 2023). Ongoing work with framework providers.	Area under development at present. Road map > policy > strategy > policy implementation

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16-b PTNR1	Finance	Enforced Partner Contract Changes	(Historic Partner contracts) A requirement to convert partner contracts to worker contracts will lead to significant costs for HCPC due to changes in how employment law is interpreted and applied.	Partner	Exec Dir of GAP Partner Project Lead	4	5	20	Mitigate	Create robust enforceable partner contracts which lower risks of legal challenge in future. Task & Finish Group established.	Exec Dir...GAP Partners Project Lead	31.07.22	4	4	16	Aug/Sept 2023	8	Potential outcomes calculated. Draft contracts, T&C's reqd	No definitive information on costs, process but full list of options being maintained.	
16-c PTNR2		Enforced Partner Contract Changes - future	Future Partner costs are increased due to enhanced rights, terms and conditions resulting from NMC case, impacting HCPC budget.	Partner	Exec Dir of GAP Partner Project Lead	4	5	20	Accept?	Financial provisions related to increased Partner unit costs based on updated contracts.	Exec Dir of GAP, Partner Project Lead		4	4	16	Aug/Sept 2023	6			
17 PTNR3	Reputation	Ineffective Partner Training	An inability to provide effective partner training will affect partner performance, the reputation of HCPC and cause non-compliance to PSA standards due to difficulties in monitoring training effectiveness, damaging public protection ensuring it meets changing requirements and ensuring that partner's are fully engaged with it.	Partner	Exec Dir of GAP Partner Project Lead	4	3	12	Mitigate	Ongoing annual reviews with stakeholder input and aligned to the outcome of the tribunal case. Updated KPI Partner rpt, feedback survey on training effectiveness, updated training programme, e-learning, ongoing and up to date with current practise, legal partner based training for all partners. QA of services provided by Partners.		31.03.22	3	3	9	Aug/Sept 2023	3		Paper from Uta and legal advice going to ELT and RemCom. eLearning, attendance etc logged, content not resp of Ptnrs Dept	
18-P PTNR4	Operations	Recruitment and Retention Issues	An inability to recruit and retain partners will lead to higher training and churn costs and reduce the quality of service delivered by HCPC due to a competitive job market and a poor perception of HCPC amongst partners.	Partner		3	3	9	Mitigate	Work closely with colleagues across the business to support retention and recruitment of partners. Visitor role becoming more difficult to recruit to. Review roles and engagement with partners and consider alternate solutions.	Partner Project Lead	30.09.21	3	3	9	Aug/Sept 2023	3		Visitor role now paper based, and less attractive. Shortage professions, but EDU can operate at current levels. Risk might be going up. Monitor rqmts applied vs. appnts vs required.	
NEW 13/06/20 22 PTNR5		Poor quality Partner decisions	Inconsistent or poor quality decisions by Partners result in lack of trust in HCPC regulatory decisions. SPLIT OUT RISK TO REGULATORY DEPTS _ UNDER DISCUSSION	Partner	Partner Project Lead	4	3	12	Mitigate	Regular robust training, analysis of feedback from S.29 reviews (PSA), internal audits, ICP seperation. Decision Review Group & Decision Assurance Group & Legally Qualified Chairs for ICP.			4	2	8	Aug/Sept 2023	6		Reg depts	

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PTNR6		Partner Diversity pool	Partner diversity does not reflect registrant or lay or legal service provider characteristics due to restrictions on the recruitment pool available at time of service planning, and actual recruitment.	Partner	Exec Dir of GAP Partner Project Lead	3	3	9				3	2	6	Aug/Sept 2023	To be determined		50% of profs EDI examined so far	Prtnr roles defined, EDI data for Rgnts to be compared in future.	
PTNR7	Operations	Partner Dept workload	Increased operational workloads due to changing Partner contracts reflecting updated requirements place increased pressure on Partners Dept.	Partner	Exec Dir of GAP Partner Project Lead	4	3	12				3	3	9	Aug/Sept 2023	To be determined				
PTNR8	Operations	Partner value for money	Updated (NMC case compliant) Partner contracts may reflect poor value for money, whilst increasing operational costs.	Partner	Partner Project Lead	4	4	16				4	3	12	Aug/Sept 2023	To be determined				

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28 POL1	Operations	Policy and Standards Department Resourcing Limitations	Policy and Standards Department resourcing issues will impact its ability to meet the requirements of an evolving organisation and manage BAU, when Regulatory Reform timelines are announced. (HCPC could be next with NMC). Policy Coordination is a potential issue.	Policy and Standards	Exec Dir of Governance, Assurance & Planning	3	5	15	Mitigate	Fully staffed department for current requirement. Requirement for Regulatory reform subject to ELT decision. Awaiting gvm plans mid Jan, for next Regulator change. Three different options, 7, 4 or 3 additional roles. Options provided. HCPC in next group for Reg Reform (NMC & GMC, PA& AA) order for consultation in end of October. One coming in to cover Pol Mgr role, Jan/Feb, and temp resource to cover analysis work. One role (Pol Mgr) outstanding at present.	Head of Policy	01/04/2022 Updated Policy Team in December 2022, 2023 if Reg Reform progresses for HCPC.	3	5>4	12	Aug/Sept 2023	8		Okay, but no major Reg Reform yet	PSA moved to QA responsibility. Impact of changes in Policy on whole org. I/L incr post mitig. Further changes, 1 jnd, 1 lvg April
30 POL2	Reputation	EDI Non-Compliance	Failing to meet EDI goals will lead to regulatory non-compliances (PSA Standards), inconsistencies in the level of service delivered to specific stakeholder groups and impact the reputation of HCPC due to ineffective EDI data collection processes. EDI requirements not considered during policy or process change result in unintended non compliance with legal requirements.	Policy and Standards	Exec Dir of Governance, Assurance & Planning	4	4	16	Mitigate	1) Registrants EDI information is held alongside the Reg record (infosec assured); comms programme in place to encourage registrants to provide their EDI information to improve coverage. (Integrated into the renewals process.) 2) Appropriate analytical skills inhouse to interpret data across regulatory functions. 3) EDI Lead in post, and EDI action plan in place and running. 4) EDI data capture progressing across registration, ftp and complaints. Prof body liaison, relationship manager approach. 5) EDI Impact analysis process in place. 6) Information supplied to decision makers as required.	Head of Policy Head of Policy Head of IT & Head of Business Change, Head of Insight & Analytics	Mar 2022 Mar 2022 In progress	3	3>2	6	Aug/Sept 2023	6		Will have been through all profs renewal by this time 2023. FTP data analysis occurring in background. Future collection of complainant EDI data linked to case, and compared to Registrant EDI data	Lowering as more professions go through renewal and mass data capture PSA may have new reqmnt in future Still along way off EDI vs. FTP data still in short supply. Online concerns - collecting EDI of complainants not in place yet, project delay.
31 POL3	Strategy	Lack of Clarity on HCPC's Role	Registrants and their professional bodies being unclear of the role and responsibilities of HCPC will impact perceived service quality and the reputation of HCPC due to a lack of ongoing communication of HCPC objectives and responsibilities to stakeholder groups and changing HCPC business strategies.	Policy and Standards	Executive Director, Professional Practise and Insight	2	4	8	Mitigate	Ongoing standards review and communication of such Establishment of (1/4ly) professional body engagement group. Ongoing newsletters, web content. Ongoing development of Professional Liaison function. Stakeholder mapping and engagement strategy in place. Relationship management approach currently being put in place across HCPC to build trusted relationships. Model to capture and share key stakeholder insights in development.	Head of Policy Communications Lead	Current / ongoing	2	3	6	Aug/Sept 2023	4			Approach embdng Monthly updates on main themes; SCPE consult end of month. Support for eg intl regnt to prevent them falling into FTP.
POL4	Operations	Lack of Corporate memory and documentation	Poorly documented past legal advice may lead to difficulties should our approach be challenged, resulting in re-evaluation of policies and processes.	Policy and Standards	Exec Dir of Governance, Assurance & Planning	3	3	9	Mitigate	Full review and documentation of our approach to addressing regulatory requirements during the Regulatory Reform process. Rcnd internal legal resource. Inventory of existing (legal and other) advice in the archive. Historic legal advice 2017 onwards, file located within Policy & Stds.	Head of Policy		3	2	6	Aug/Sept 2023	4		Obtained new legal advice when required and maintain audit trail. Ongoing archive listings to be generated	

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POL5	Reputation	Lack of EDI input into policy & process	EDI data, capacity and understanding not fully available to support appropriate oversight of regulatory and business functions resulting in inappropriate actions.	Policy and Standards	Exec Dir of Governance, Assurance & Planning	3	4	12	Mitigate	EDI data analysis and interpretation; Progression of EDI Action plan; Council & PRC insight on EDI analysis via periodic papers. Inclusion of SLEDI on Project Boards to improve compliance. EDI steering group in place	Strategic Lead EDI	4	2	8	Aug/Sept 2023	8		Data portal in place (for use by internal and external parties to aid analysis)	Need to maintain audit trails for legal advice. Much of EDI Action Plan is carried out outside the direct control of SLEDI.	
POL6			Advanced Practise impacts Currently unknown how HCPC can influence the development of this agenda			TBD	TBD			TBD					Aug/Sept 2023					
POL7		English Language ability evidence	Increased monitoring of English Language capability by evidence may impact incoming workforce, rather than adjusting scores.	Policy and Standards	Exec Dir of Governance, Assurance & Planning	4	4	16	Mitigate	Combined Reg, Policy & EDI Lead to determine actions and requirements Council seminar and engagement on EDI future impacts, with English Language as a working example.					Aug/Sept 2023			Maintained list of intl countries where English would have been used to sufficiently high standard	Indirect impact potential on intl applications due to enhanced reqmnt for evidence rather than increasing required scores.	
POL8 NEW	Reputation	Welsh Language scheme	Failure in Compliance with updated Welsh Language scheme within prescribed time scale could lead to reputational damage and	Policy and Standards	Exec Dir of Governance, Assurance & Planning					Evaluate existing processes to operate in Welsh					Aug/Sept 2023					

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PUSR1	Operations	Incorrect understanding of standards documentation	Incorrect articulation of standards for stakeholders results in incorrect interpretation by registrants.	Prof & Upstream	Executive Director, Professional Practise and Insight	3	3	9	Mitigate	Content shared with Policy originators, to validate Prof & Upstream materials and interpretation prior to use with stakeholders. Very good relationship with Comms dept, good awareness of up and coming events. Shared content between group, and prof bodies. Full representation in 4 home countries.	Head of Professionalism and upstream regulation		2	2	4	Aug/Sept 2023	4		Policy sign off on interpretation. SOPs in place, ScPE's next.	
PUSR2	Reputation	Strategic relationships with strategic partners incorrectly assigned weight and resource.	Strategic Relationships: incorrect level of engagement with Strategic Partners? Appropriately balanced and filtered. Internal & external aspects Incorrect application of stakeholder map and prioritisation	Policy and Standards	Executive Director, Professional Practise and Insight	4	4	16	Mitigate	Strategic Relationship Lead Luther providing support & expertise & Prof Body quarterly mtgs to filter or target work Relationship Mgmt Model Prof body mtgs. Q4 Rvw of process Priority areas targeted, EMG. Regional aspects covered by 4 home country reps, input from Strat Lead and discussion. Prof bodies re-prioritised recently.	Strategic Relationships Lead	Ongoing but progress mtg end Q4	4	2	8	Aug/Sept 2023	8		Improve Rel model and expand, resourcing level consideration. Less V High level engagement use (ELT).	Fee Rise, good process although outcome not as wished. England under reps'nt
PUSR3	Reputation	Impact of poor stakeholder relationships	Poor Professional body relationships with HCPC may impact trust of the regulator by registrants or other stakeholders	Policy and Standards	Executive Director, Professional Practise and Insight	4	4	16	Mitigate	Strategic Relationship Lead Prof Body quarterly mtgs to filter or target work Relationship Mgmt Model Prof body mtgs Collaborating with Prof bodies to design & deliver material. (Prof Body Forum, grown from 8 to 25 over last year or so)	Strategic Relationships Lead	Ongoing but progress mtg end Q4	3	3	9	Aug/Sept 2023	6		Improve Rel model and expand, resourcing level consideration	Clin Sci being covered, small prof bodies
PUSR4	Reputation	Effective Stakeholder engagement	Lack of strategic relationships with key partner organisations or patient groups may lead to ineffective engagement or lack of awareness of key issues (selecting the right pipelines of information). Correct propagation of information to relevant part of HCPC in an appropriate & timely fashion that results in the required regulatory action.	Policy and Standards	Executive Director, Professional Practise and Insight	4	4	16	Mitigate	Strategic Relationship Lead Expansion of Rel mgmt model Deve of service user strat Escalation policy & flowchart, of response mechanism to pseudo regulatory events. Development of an Intelligence model with EDU dept on regional basis. Patient Assoc work in future	Strategic Relationships Lead	Ongoing Q4 Initial scoping Q3; work 23/24 onwards	3	2	6	Aug/Sept 2023	6		18 month time scale? Improve Rel model and expand, resourcing level consideration	Needs specific resources as very bespoke rqmnt. Stnds changing, input from Patient
PUSR5	Reputation	Strategic Relationships Resourcing	Level of resourcing for Strategic Relationships magement is insufficient for task	Policy and Standards	Executive Director, Professional Practise and Insight	4	4	16	Mitigate	Strategic Relationship Lead Devolution of Relationship Mgmt to across different teams resources. PA has expanded level of support to team as additional cover. (Limited resource to take on further engagement as expectations build on recent success)	Strategic Relationships Lead	Ongoing	3	3	9	Aug/Sept 2023	6		Further dedicated Strat Rel resourcing, awaiting funding	Nebulous, ad hoc as part of other role. English representation is acting as Dept Lead, so less cover.

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70 PBC1	Strategy	Absence of Annual Budget Planning	An absence of annual budget planning will impact the delivery of organisational objectives due to project roadmaps not aligning to the organisational strategy.	Project	Head of Business Change	4	1	4	Mitigate	Feb 2023: Investment process completed and papers submitted to PRC in alignment with financial target set by ELT and Council for a balanced budget. Papers due to be reviewed by Council in March. Mar 2023: Change and Benefits forum established and initial TOR agreed with ELT. Will be used to support investment and budget prioritisation. First meeting in April 2023.	Head of Business Change		4	1	4	Aug/Sept 2023	4			
71 PBC2	Strategy	Project Department Resourcing Limitations	Project management resourcing issues will impact the delivery of organisational objectives due to the Project Department not having the required staffing numbers to deliver the high rate of required change.	Project	Head of Business Change	3	3	9	Mitigate	Feb 2023: Recruitment underway for final post in team. Workload allocation will be driven through Workplans and Change and Benefits forum. Key priorities will be driven by available resources. Current recruitment to target potential PM skillset for Regulatory reform.	Head of Business Change		2	2	4	Aug/Sept 2023	4		only 1 FTE to recruit for	
72 PBC3	Finance	Lack of an Integrated Financial System	Lack of an integrated financial system will result in inefficient management of project finances and discrepancies between project and finance accounting due to project financial management being a manual, stand alone process.	Project	Head of Business Change	2	1	2	Mitigate	Feb 2023: Full year reforecasting completed, and process agreed with Finance to publish monthly reconciliations.	Head of Business Change		2	1	2	Aug/Sept 2023	4		Future integration BC potentially, but own detailed tracking anyway.	
73 PBC4	Finance	No Project Backfill Budgeting	Requirements to fund backfill on each project will result in higher than expected project spend due to there being no centralised allocation of budget for backfill requirements.	Project	Head of Business Change	3	3	9	Mitigate	Feb 2023: Paper shared with PRC and advised of possible timeline impact to Data due to resource request being deferred to after fee-increase. Backfill resources have been engaged for Business Central. Resourcing will be established at the point of Initiation and reviewed in line with updated workplan approach. Whilst approach is in place, risk will remain open as Resource constraints will still impact areas such as data.	Head of Business Change		2	2	4	Aug/Sept 2023	4			
74 PBC5	Strategy	Lack of Clear and Consistent Communication	A lack of clarity on the business strategy and its outcomes among employees will impact the delivery of organisational objectives due to a lack of clear and consistent communication from leadership.	Project	Head of Business Change	3	1	3	mitigate	Feb 2023: Corporate planning approach, and ELT sharing of Corporate objectives have reduced the likelihood of this Risk occurring. SLT engagement the Change and Benefits forum will further support this. Updated approach created between ELT and SLT will further increase awareness of strategy.	Head of Business Change		3	1	3	Aug/Sept 2023	4			
75 PBC6	Operations	Lack of Benefit Analysis and Tracking	A lack of benefit analysis and post implementation benefit tracking will result in poor project prioritisation and an unclear realisation of value due to a lack of measurable benefits being defined in each project business case and there being no clear business change ownership.	Project	Head of Business Change	3	2	6	Mitigate	Jan 2023: Benefits workshop conducted with BDO to establish best practices and learnings. Outputs are under review and being included in the TOR for the Benefits and Change forum. The objective being agreeing organisational wide Benefits identifiers and then ensuring that all investments are aligned to these benefits. Non-tangible benefits will be short listed from existing strategies. Project closure no includes post project benefits realisation plan creation. Risk remains open until new non-tangible categories are agreed and Business Cases processes are updated.	Head of Business Change	Sep-21	2	2	4	Aug/Sept 2023	4			
76 PBC7	Strategy	Ineffective Adoption of Agile Methodologies	Ineffective Agile methodology adoption will impact the delivery of organisational objectives due to a failure to fully assess the impact of Agile on existing processes and systems, poor staff awareness and a lack of training for key stakeholders.	Project	Head of Business Change	2	3	6	Mitigate	Jan 2023: Training now in place for AgilePM across the team to embed Agile in processes. Product Management team is implementing 6-week continuous improvement cycles for the core Regulatory functions (this included IT). Approaches to delivery for major projects now consider Agile as first option. We still progressing of updating process documents on methodology. March 2023: Team training on AgilePM completed	Head of Business Change	Sep-21	2	2	4	Aug/Sept 2023	4		Early deliverables are valued, rather than big bang.	
77 PBC8	Strategy	Project Governance Reduction	A reduction in project governance will impact the delivery of organisational objectives due to project initiation processes not being completed effectively when Agile methodologies are followed.	Project	Head of Business Change	2	2	4	Mitigate	Feb 2023: All Investment work to be started will be first assessed by the Change and Benefits forum.	Head of Business Change		2	2	4	Aug/Sept 2023	4		Improving Gov function in Proj/Bus Change into ELT.	
80 PBC9	Operations	Poor change management	Failure to manage change management across the organisation leads to conflicting or missing processes or functions resulting in local failures in regulation	Project	Head of Business Change	4	2	8	Mitigate	Feb 2023: Change and Benefits forum will be used as a body to assess Business Cases and Initiation documents prior to ensure full coverage of correct designs and planning ahead of project start.	Head of Business Change		2	2	4	Aug/Sept 2023	5		Jn BDO workshop outputs	
PBC10	Operational Risk	Supplier stability during recession may impact service availability	The FTP CMS system is hosted by an external supplier and key FTP data is held within their systems. The supplier, whilst having a stable balance sheet is small compared to IBM and Microsoft, so concerns of the impact of the recession on the business model need to be monitored.	IT &	ED of BRP	5	3	15	Mitigate	1/8: Risk raised to Head of IT be Head of BC and both Head of BC and Head of IT have discussed options with ED of BRP. Whilst no immediate risks are evidenced, an increased priority is being placed on ESCROW arrangements (previously planned for post Phase 2 in March 2023) and discussions are in place internally to monitor financial performance of the organisation. BCP processes and options on the platform will be reviewed.	HOD (IT) and HOD (BC)	ongoing	5	3	15	Aug/Sept 2023	3		Escrow discussions held with Sliced Bread, IT & finance in place for agrmt	Heavy dependence on Nexus workflow

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PBC11		IBM Support contract due to expire in Jan 2024	The current supplier agreement for Application development expire in January 2024. Previous experience has shown that 3 - 6 months is needed to successfully negotiate new contracts. If Suppliers are to be changed, a significant effort will be required to conduct asn service and knowledge transfer. A supplier relationship is essential for Business Change to conduct thier operations.		Head of IT and Digital	5	3	15	Mitigate	Shared with Head of IT for Inclusion of workplan. Alternate consideration may be to move supplier contract discussions to Business Change as the primary customer.	HOD (IT) and HOD (BC)		2	1	2	Aug/Sept 2023	3			
PBC12		Product Management resourcing	Resource & budget allows small scale changes, but major investment is required to achieve larger project, requiring balance.	Product Mgmt	Product Mgmt Lead	2	4	8	Accept	N/A	Produc Mgmt Lead	Current	2	4	8	Aug/Sept 2023			Checkpoints and milestones in place	
PBC13		Product Management knowledge	Upskilling knowledge to maximise effectiveness, while providing oversight of an imature team. Leaves some outstanding items on back burner.	Product Mgmt	Product Mgmt Lead	3	2	6	Mitigate	Improve knowledge of escalation processes at HCPC, improve escalation process facing in Business areas.	Produc Mgmt Lead	Current	3	1	3	Aug/Sept 2023			Some std documentati on shared with IT	
PBC14	Operations	Single point of failure	Single product manager for each core application creates risk/ potential for single point of failure and loss of knowledge & product expertise.	Product Mgmt	Product Mgmt Lead	4	3	12	Mitigate	<ul style="list-style-type: none"> •Knowledge share activities including team meetings and project work where the team work together. •Team cover each other during annual leave •Product Manager lead – developing own product knowledge of each system •Potential to develop system champions and user experts within core regulatory application area to disseminate product knowledge– action KB to discuss with heads of 	Produc Mgmt Lead	Current	3	3	9	Aug/Sept 2023				
PBC15	Operations	Change management risk to production	Risk of poor change management causing a change to create a system break in production	Product Mgmt	Product Mgmt Lead	4	4	16	Mitigate	<p>CAB – provides governance of changes released into production to manage risk</p> <p>Testing approach – improvements in test planning being explored to identify risk areas and mitigate through testing</p> <p>Roll back and Issue management processes in place post change – processes to test and monitor/ improve and/or roll back issues found in production</p>	Produc Mgmt Lead	Current	4	3	12	Aug/Sept 2023				
PBC16	Operations	Poor Third party support	Poor service/ support from third party developers affecting performance of backlog and value for money	Product Mgmt	Product Mgmt Lead	2	3	6	Mitigate	<p>Agreed service contract terms – in place</p> <p>Guidance on briefing and estimating process to product managers – KB to action documented guidance on briefing – documentation on estimating process and budget sign off in place</p> <p>Peer review of SOW – in place so that estimates for similar work items can be reviewed and compared</p> <p>Prioritisation meeting gives oversight of the proposed change?</p>	Produc Mgmt Lead	Current	2	2	4	Aug/Sept 2023				

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57 QA1	Operations	Concentration on Remedial Work	Due to resource limitations currently compliant regulatory areas may be developing underlying issues leading to future PSA non-compliance due to attention being focused on obvious high risk areas.	QA	Head of A&C	3>4	3	12	Mitigate	QA activity in Regulatory departments. QA activity is prioritised by risk. Currently meeting all Registration, Education and 3 out of 5 FTP standards. More robust first line checks in place in FTP, and in dev for EDU & REG. Only highest priority risk areas are evaluated due to decreased resource. Unified Assur Frmwk embedded.	Head of A&C	Current	2	2>3	6	Aug/Sept 2023	4	Measured	Continue building Risk culture.	eg Reg application fraud risk.
58 QA2	Operations	Departments not complying with public facing standards and guidelines	Failure by QA to identify non compliance with approp standards & guidance & legislation in Regulatory departments which are not complying with public facing standards and guidelines will lead to PSA non-compliance and a risk to the public.	QA	Head of A&C	4	3	12	Mitigate	Support of departmental first line checks. QA activity in Regulatory departments. Inherent institutional knowledge, collaborative team working to avoid unconscious bias enabling - scoping mtgs, Methodology doc in place (2012), to be reviewed in full 2023/4. Robust sampling methodology based on sample calculator, provides confidence level and margin of error.	Head of A&C	Current	4>3	2	6	Aug/Sept 2023	5		Further dev of model if capacity allows in future?	Institutional knowledge key
QA3	Operations	Focus on traditional areas of failure distracts from new areas of risk	Due to prioritisation bias, some underlying risk areas may be under examined, leading to subsequent non compliance via under developed processes.	QA	Head of A&C	3	3	9	Mitigate	Validated risk based prioritisation process, with ELT challenge on areas less focused on. Formal risk assurance workplan, incorporating three lines approach. Prioritisation with Regulatory dept heads, and output of previous QA activity considered as part of prioritisation. IA and QA activities aligned.	Head of A&C	Current	2	2>3	6	Aug/Sept 2023	4			
QA4	Operations	No capacity for additional scope	Resource risk impacts being unable to meet additional requests for further spread of work	QA	Head of A&C	3	3	9	Mitigate	Potential for Scope to be amended for prioritised activities. Head of Q & C status on compatible level with colleagues. Transparency of UAF with ARAC & ETC, ELT aware of resource constraints.	Head of A&C		2	3	6	Aug/Sept 2023				

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5+A2:X99 REG1	Public Protection	Registration Process Failures	Public protection issues will lead to non-compliance to PSA standards and affect the reputation of HCPC due to staff errors in the registration process for new registrants.	Registration and CPD	Head of Registration	4	4>3	12	Mitigate	Audits by Registration Management, system audit trails, external auditors. Policy and procedures supported by quality assurance activity and process controls/checks Adherence to PSA Registration standards.	Head of Registration	Ongoing	4	3>2	8	Aug/Sept 2023	4	Minimal Measured Open Seeks	Increasing automation, online services and improved business rules, incl UK passlist matching in short to medium term. Targetted checks, QA within registration based on feedback from QA, increased focused effort. Wrokshops etc, intl then expanding out to other areas. Planned review of QA vs. Reg WP. Rvw PWC Partners rpt impact on Reg	No change yet but expected to decrease now if PSA report is favorable?
61 REG2	Public Protection	Registrant Fraud	Public protection issues will lead to non-compliance to PSA standards and affect the reputation of HCPC due to fraudulent information being used in registration or renewal applications.	Registration and CPD	Head of Registration	4	2	8	Mitigate	Certification of documents, matched to Education provider passlists, Financial audits, system audit trails. Policy and procedures supported by internal quality audits. International verification processes i.e. previous employers, regulatory bodies and Education providers validated	Head of Registration	Ongoing	4	1	4	Aug/Sept 2023	4	Minimal Measured Open Seeks	Increasing automation, online services and improved business rules, incl passlist matching in short to medium term	
62 REG3	Operations	System Failure	A technical failure of the online registration system will impact process registrations and renewals due to an increase in the use of the online application process. This includes upgrades of all potentially related systems.	Registration and CPD	Head of Registration	4	4	16	Mitigate	External IT support contracts. Well trained in house IT employees. Effective project management of new product delivery. Option for down time mgmt in place, typically 3 hrs or so.	Head of Registration	Ongoing	4>3	3	9	Aug/Sept 2023	12	Minimal Measured Open Seeks	Improved business change continuity process in place. Single Platform? Review of priorities in BC plan	
63 REG4	Operations	System Interfaces	A technical failure of any system that the registration team is reliant upon will impact registrations and renewals due to an increase in the number and complexity of interfaces between operational systems. This includes upgrades of all potentially related systems.	Registration and CPD	Head of Registration	4	4	16	Mitigate	External IT support contracts. Well trained in house IT employees. Effective project management of new product delivery. IT reviewing email categorization.	Head of Registration	Ongoing	4>3	3	9	Aug/Sept 2023	12	Minimal Measured Open Seeks	Improved business change continuity process in place. Single platform?	
64 REG5	Information Security	Data Sharing	The confidentiality of data being breached will impact the reputation of HCPC due to registration and appeal data packs being transferred to external parties via unprotected email.	Registration and CPD	Head of Registration	3	3	9	Mitigate	e-Bundles software adopted. Password delivery systems to be considered	Head of Registration	Ongoing	3	2	6	Aug/Sept 2023	3	Minimal Measured Open Seeks	Portal only access with business rules could lower likelihood down to 1. Single route of response, via CRM under consideration.	
65-b REG6	Operations	Sustainability of Current Working Practices - employee availability	Retention of trained, effective employees in current market may impact processing rates.	Registration and CPD	Head of Registration	4	4	16	Mitigate	Regular contact with employees. Introduce hybrid working. HCPC Health and wellbeing initiatives. Introduce Online applications, implementation cloud based contact centre telephony. Review operating model, roles etc. Piloting new operating model, online, specific team functions etc 6 week temp to perm process. New Pay structure April 2023 may assist in retention of RA's.	Head of Registration & Head of HR	Ongoing	4	3	12	Aug/Sept 2023	6	Minimal Measured Open Seeks	Fully used controls of processes and functionality of CRM, validation of outcomes. New digital strategy implementation. Formalize new Operating model	More stable, lowers pressure on employees? Improved perf mgmt in Reg dept

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66 REG7	Operations	Rollout of New Fee Structures	An increased likelihood of errors in the application of registrant fees or errors in automated payment processes being delivered, will affect the reputation of HCPC and may lead to financial losses due to issues with the implementation of new or existing fee structures. Quarterly DD collection may increase pymt queries, switch 6 monthly to quarterly. Registrant difficulty switching timing may increase queries for 2 years.	Registration and CPD	Head of Registration & Head of Finance	4	4	16	Mitigate	Increased ownership, continuity, and management of processes. Pilot to change operating model, hybrid working, HR People strategy	Head of Registration & Head of Finance	Ongoing	4	2>3	12	Aug/Sept 2023	4		Ongoing requirement of robust, testing of new fee structures or payment processes	Greater room for error with quarterly fee collection and new fee structure. Delayed at least until Fee rise in place + several months to implmnt
67 REG8	Operations	Appeal Process Regulation	The small pool of council members that are eligible to chair registration appeal hearings will impact the throughput of appeal cases and may cause the suitability of the chair to be challenged by appellants due to regulatory requirements being very restrictive on who can chair a registration appeal.	Registration and CPD	Head of Registration	3	3	9	Mitigate	Recruit and train eligible council members. (Not on ETC). 4 Cnl Mbr recruited and trnd and now in place.	Head of Registration	Ongoing	3	2>3	9	Aug/Sept 2023	3		Regulatory Reform, attempting to regain third Council member as before. Target of 4 Council Mbrs, but flow of work may make trng difficult. Timing issues for Cnl Mbs	
68 REG9	Operations	Lack of Out of Hours Support	Failure to respond to online issues and questions outside of normal working hours will not meet registrants service level expectations due to the registration teams only being available during standard working hours. (Generally an issue only at weekend renewal closure).	Registration and CPD	Head of Registration	3	3	9	Mitigate Accept	Clear guidance published on website. FAQs regularly updated on website. User experience testing before new product launch. Weekend working to allow for social media based contact and readmission requests. Lot of outbound comms prior to closure of renewal windows.	Head of Registration	Ongoing	3>2	2	4	Aug/Sept 2023	6		Ensuring publication of professional cycles to public & prof bodies. Ensure weekend cover during closure of renewal windows Investigate Automated response to online queries overnight (High cost solution)	
69 REG10	Operations	Insufficient Departmental Engagement in Projects	Insufficient departmental engagement or sufficient qualified resource for backfill in projects will result in business requirements not being fully met due to limitations on the amount of resource that departments can allocate to projects.	Registration and CPD	Head of Registration	4	4	16	Mitigate	Dedicated resource included within project business case. Technical & Business expertise in place. Scoping of Reqs may be more difficult. Product Mgr assists in providing support for UAT and ongoing system support. Ex Reg exp in Change Teams, cover UAT and dev focus.	Head of Registration Head of Bus Change	Ongoing	4	3>2	8	Aug/Sept 2023	4>6		(Insufficient SME's in Reg)	
REG11	Operations	Contact Centre	Timeliness and quality of contact centre interactions with applicants, registrants and other stakeholders results in poor information flow and reputational damage	Registration and CPD	Head of Registration	4	4	16	Mitigate	Generation of issue based scripts to ensure quality of information is delivered, upskilled workforce with internally delivered CC training. Specialised contact centre team, building experience and skills in CC activities. More available & accessible information on website. [Budget etc] Call Recording back in place to assist ongoing monitoring of call quality	Head of Registration	Sep-22	4	2	8	Aug/Sept 2023	6		Change mgmt for guidance updates, Tone of Voice applied to registration processes. Appropriate sign posting as required. Utilising recently implimented cloud based contact centre with appropriate 1st & 2nd line response mechanisms. Opp to integrate cloud Mitel with CRM, automated pop ups, record data direct into CRM.	

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REG12	Operations	International Applications	Processing backlogs of International applications results in delays to expansion of UK registrant workforce and potential conflict with PSA standards	Registration and CPD	Head of Registration	4	4	16	Mitigate	Additional Budget for 10 RA's & 1 TL in place. Online international application process available to capture applicant input directly into CRM database. Additional 31 Reg Assessors recruited over summer 2022. Inside SLA currently.	Head of Registration	Sep-22	4>3	3>2	6	May/June 2023	8	Minimal Measured Open Seeks	Forecasting with specific input on programmes of recruitment (HEE etc). Verification is slowest part of process. Formalization of Reg Operating model to maintain KPI adherence	Dependant on resource in place
REG13	Operations	Reporting	Inconsistent use of inbuilt CRM reporting and ad-hoc solutions delivers conflicting data over time resulting in poor visibility of processes, performance and improvement	Registration and CPD	Head of Registration	4	5	20	Mitigate	Robust implementation of standard reporting supported by training of all RMs & TL's to obtain and use data consistently. Removing reliance on manually input data to Excel spreadsheets and using data from CRM source. Dashboards in place across Reg Procs, more needed. Ongoing work in I&A enhancing Reg data quality	Head of Registration	Dec-22	4	4>3	12	Aug/Sept 2023	4	Minimal Measured Open Seeks		No more progress currently, June 2023
REG14	Operations	Capability	Experience, skills & knowledge of workforce; and process documentation and guidance does not match current requirement of business or match stakeholder expectations resulting in missed opportunities and KPI's.	Registration and CPD	Head of Registration	4	4	16	Mitigate	Trialing more specialist teams focused on covering core areas. UK, International, Call Handling. Developing more detailed guidance on core areas. Ongoing core activity training and upskilling of engaged employees, with expanded career opportunities and potential progression.	Head of Registration	Dec-22	4	3>2	8	Aug/Sept 2023	4	Minimal Measured Open Seeks	External rcmnt for areas where no resource available. New operating model. Process for updating process documentation and guidance being developed.	Processing apps within days, answering calls almost 100%, 15-20 secs
REG15	Operations	Capability	Registration Partners make incorrect, or unsupportable recommendations without internal challenge.	Registration and CPD	Head of Registration	4	3	12	Mitigate	Appeals mechanism as a flag of error, partner training every two years. Any appraisal mech would need to be centralised. Any appealable decision by Ptnr should be assessed by Reg Mgr.	Head of Registration, Partner Lead		4	2	8	May/June 2023	4	Minimal Measured Open Seeks	Potential assessor decision appraisal in future via QA? Should a percentage of positive decisions also be checked, as putting someone on the register is also a risk to be considered.	will challenge some decisions, gen negative recommendations are challenged but putting on register is greater

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REG16	Operations	Modalities & Annotations	Accuracy of modality and annotation data on registration records impacts reporting and functionality of the registers.	Registration and CPD	Head of Registration	4	4	16	Mitigate	Targetted mailing campaign to gather data and update registration records. Update technology to ensure the requirement to provide modality information is mandatory for the relevant professions. Update technology to ensure all orthoptist new UK applications receive the annotation linked to their education programme.	Head of Registration		4	3	12	Aug/Sept 2023	4	Minimal Measured Open Seeks	Targetted mailing Jan/Feb 2023, then update records Await technology fixes for automation / validation upon save. <small>Top 5 priority to fix in CRM (OR's in future) App process needs mandatory field status.</small>	Art Therapist modality question
REG17	Operations	Non CRM processes	Registration processes outside the CRM database are less automated and susceptible to human error or omission, resulting in greater risk of failure.	Registration and CPD	Head of Registration	3	3	9	Mitigate	Progressing through backlog of requirements for CRM integration as other dependancies allow.	Head of Registration	Ongoing	3	2	6	Aug/Sept 2023	4	Minimal Measured Open Seeks	UKEmail box Call Centre functionality SMS capabilities	

Collect updates	ELT meeting	Audit & Risk Comm
May		
June		
July	July	
August		
September		September
October	October	
November		
December		
January	January	
February		
March		
April	April	
May		
June		
July	July	

IMPACT TYPES

IMPACT

Public Protection	Financial	Reputation
Catastrophic 5	Catastrophic 5	Catastrophic 5
A systematic failure for which HCPC are ultimately responsible for, exposes the public to serious harm in cases where mitigation was expected.	Unfunded pressures greater than £1 million	Incompetence/ maladministration or other event that will destroy public trust or a key relationship
Significant 4	Significant 4	Significant 4
A systematic failure for which HCPC are ultimately responsible for, exposes more than 10 people to harm in cases where mitigation was expected.	Unfunded pressures £250k - £1 million	Incompetence/ maladministration that will undermine public trust or a key relationship for a sustained period or at a critical moment.
Moderate 3	Moderate 3	Moderate 3
A systemic failure for which HCPC are ultimately responsible for exposes more than 2 people to harm in cases when mitigation was expected.	Unfunded pressures £50,000 - £250,000	Incompetence/ maladministration that will undermine public trust or a key relationship for a short period. Example Policy U-turn
Minor 2	Minor 2	Minor 2
A systemic failure which results in inadequate protection for individuals/individual communities, including failure to resolve celebrity cases.	Unfunded pressures between £20,000-£50,000	Event that will lead to widespread public criticism.
Insignificant 1	Insignificant 1	Insignificant 1
A systemic failure for which fails to address an operational requirement	Unfunded pressures over £10,000	Event that will lead to public criticism by external stakeholders as anticipated.

LIKELIHOOD AREAS

LIKELIHOOD

Strategic	Programme / Project	Operational
Highly Likely 5	Highly Likely 5	Highly Likely 5
"Clear and present danger", represented by this risk - will probably impact on this initiative - sooner rather than later.	Likely to occur in the life-cycle of the project, probably early on and perhaps more than once.	The threat is likely to happen almost every day.
Likely 4	Likely 4	Likely 4
Likely to happen at some point during the next one or two years.	Likely to happen in the life-cycle of the programme or project.	May well happen on a weekly basis.
Possible 3	Possible 3	Possible 3
May well occur during the lifetime of the strategy.	May occur during the life of the programme or project.	May well happen on a monthly basis.
Unlikely 2	Unlikely 2	Unlikely 2
Only small chance of occurring in the lifetime of the strategy.	Not likely to occur during the lifecycle of the programme of project.	Does not happen often - once every six months.
Highly Unlikely 1	Highly Unlikely 1	Highly Unlikely 1
Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.

Reference data for Risk Matrix tracked changes

IMPACT	LIKELIHOOD	Risk scores	RISK RATING	TREATMENT TYPE	RISK TYPE
Catastrophic = 5	Highly Likely = 5	20 - 25	High	Mitigate	Finance
Significant = 4	Likely = 4	11 - 19	Medium / High	Accept	Information Security
Moderate = 3	Possible = 3	6 - 10	Medium	Avoid	Strategy
Minor = 2	Unlikely = 2	3 - 5	Low / Medium	Transfer	Operations
Insignificant = 1	Highly unlikely = 1	1 - 2	Low		Public Protection Reputation

Summer 2021

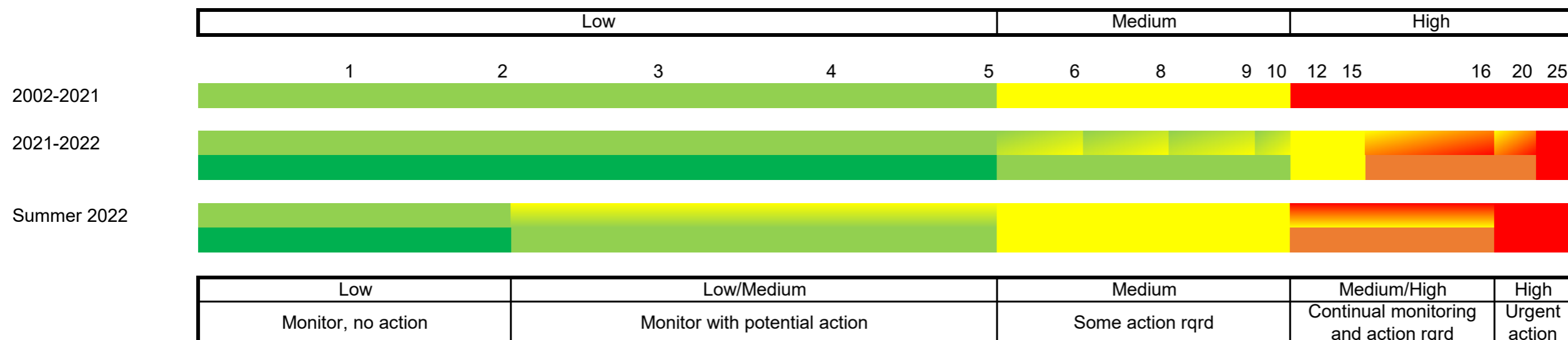
Catastrophic	5	10	15	20	25
Significant	4	8	12	16	20
Moderate	3	6	9	12	15
Minor	2	4	6	8	10
Insignificant	1	2	3	4	5
	Highly Unlikely	Unlikely	Possible	Likely	Highly Likely

Summer 2022

Catastrophic	5	10	15	20	25
Significant	4	8	12	16	20
Moderate	3	6	9	12	15
Minor	2	4	6	8	10
Insignificant	1	2	3	4	5
	Highly Unlikely	Unlikely	Possible	Likely	Highly Likely

Required action for risk level

Urgent Action required
 Urgent Action required
 Continual
 Some action required
 Monitor, no action



RISK APPETITE

	1	2	3	4
	Minimal	Measured	Open	Seeks
	<i>Preference for ultra-safe delivery option that allows degree of inherent risk and only limited reward potential</i>	<i>Preference for safe delivery options that have a low degree of inherent risk and may only have limited potential for reward</i>	<i>Willing to consider all potential delivery options while also providing an acceptable level of reward and VFM</i>	<i>Eager to be innovative and to choose options offering potentially higher business rewards despite greater inherent risk</i>
Regulatory Quality How will we deliver effective regulatory functions?	We avoid decisions that carry a risk to our PSA standard performance unless absolutely necessary. We avoid innovative approaches, requiring tried and tested examples of others to follow before we are willing to try new approaches.	We are willing to take low level risks of negative impact given the appropriate controls are in place and we consider the benefits are required to maintain or improve our PSA standard performance.	We are prepared to accept the risk of short term negative impacts on our PSA standard performance in order to achieve longer term benefits. We are willing to try innovative approaches given the appropriate controls for public protection are in place.	We are consistently focused on pursuing new or innovative course of action to deliver best in class performance willing to take risks to do so willing to accept performance deterioration as new approaches are tested with controls and checks in place for public protection.

<p>Compliance</p> <p>How will we comply with our statutory, regulatory and policy requirements?</p>	<p>We need to be very sure we would win any challenge, similar situations elsewhere have not breached compliances.</p>	<p>We are willing to take decisions that could be challenged only where we are confident we would win and the adverse consequences of losing are minimal.</p>	<p>We are willing to take decisions that could be challenged if we are confident we would win and the resulting gain would outweigh the adverse consequences of losing.</p>	<p>We are willing to take the chance of challenge even if the prospect of our losing such a challenge is real and the consequences significant if we see the benefits of succeeding outweigh the consequences of losing.</p>
<p>Communication & Profile</p> <p>How will we be perceived by our stakeholders?</p>	<p>Tolerance limited to communication where there is little chance of any repercussion or scrutiny. We express our views where these have significant stakeholder support already.</p>	<p>Tolerance for risk taking limited to those issues where there is little chance of any significant or lasting repercussions for the organisation's reputation with stakeholders.</p>	<p>We are prepared to accept the possibility of some reputational risk and scrutiny as a result of our position and communication, as long as there is the potential for improved outcomes for our stakeholders and the potential negative impact is short term.</p>	<p>We are willing to express our views and communicate on issues where stakeholder opinion is divided. We outwardly promote new ideas and innovations where potential benefits outweigh the risks.</p>

<p>People</p> <p>How will we be perceived by our workforce?</p>	<p>We will avoid all risks relating to our workforce unless absolutely essential. Workforce innovations avoided unless essential or proven track record elsewhere</p>	<p>Tendency to stick to status quo in terms of workforce planning. Innovations and new approaches avoided unless really necessary and successfully tried elsewhere</p>	<p>We are prepared to accept some risk as long as there is the potential for improved culture, recruitment and retention.</p>	<p>We are willing to take risks to innovate and challenge and change current practices to achieve improvements in workforce output and engagement. We recognize that innovation is likely to be disruptive in the short term but with the possibility of long-term gains.</p>
<p>Financial / VfM</p> <p>How will we use our resources?</p>	<p>We are only willing to accept the possibility of very limited financial risk. We favour the lowest cost option with the lowest risk of return on investment.</p>	<p>We are prepared to accept possibility of limited financial loss. VfM still the primary concern but willing to consider other benefits or constraints. Resources generally restricted to existing commitments.</p>	<p>We are prepared to accept some financial risk as long as appropriate controls are in place. Our approach to financial risk is long term and we are willing to invest in resources and infrastructure to improve our position in the longer term.</p>	<p>We invest for the best possible return; we are willing to invest in innovative systems and processes which offer less certainty of success where we consider the potential benefits outweigh the risk of loss.</p>