# Risk Register & Risk Treatment Plan

Marc Seale, Chief Executive & Registrar Report to Audit Committee, (Sept 2016)





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#### July 2016 Risk Assessment

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#### THE HEALTH AND CARE PROFESSIONS COUNCIL

"Top 10" Risks (High & Medium after mitigation)

**Historic Risk Scores** 

pers for m	sk owner (primary rson responsible or assessing and managing the ongoing risk)	Mitigation I	Mitigation II	Mitigation III	CURRENT RISK SCORE	Fe	eb-16	Sep-15	Feb-15	Sep-14	Feb-14	Sep-13	Feb-13	
2.7 Interruption to electricity supply (pre-mit 16) Office	ice Services Mgr		If site wide longer than 24 hours invoke DR Plan	-	High	ŀ	High	High	High	High	High	High	High	
1.8 Transfer of SW (England) from HCPC to New Reg Chief	ief Executive	Major Project Risk Register	Managed timetable	Project Plan experience	Medium									
13.3 Tribunal exceptional costs (pre-mit 25)	P Director	Quality of operational processes	Accurate and realistic forecasting	Quality of legal advice	Medium	Me	edium	Medium	Medium	Medium	Medium	Medium	Medium	
17.9 Loss of ISO27001 :2013 certification (pre-	ocess Improv &	errors, training and awareness as	Standard Operating Procedures and preventior of overwriting systems	Extend ISO systems as required	Medium	Me	edium							
2.11 Basement flooding (pre-mit 16) Office	ice Services Mgr	Flood barrier protection to prevent ingress	Periodic descaling of drainage	Investigate benefits of Non Return valves in drain gratings.	Medium	Me	edium	Medium	Medium	Medium	Medium	Medium	Medium	
13.4 Rapid increase in number of allegations and resultant legal costs (pre-mit 16)	P Director	Accurate and realistic budgeting	Resource planning	-	Medium	Me	edium	Medium	Medium	Medium	Medium	Medium		
1.5 Loss of reputation (pre-mit 15) Chief Chair	ief Executive & air		Quality of operational procedures	Dynamism and quality of Comms strategy	Medium	Me	edium	Medium	Medium	Medium	Medium	Medium	Medium	
Judicial review of HCPC's implimentation of HSWPO including Rules, Standards & Guidance (pre-mit 15)		Consultation. Stds determined by PLG's. Agreement by Council.	Appropriate legal advice sought	-	Medium	Me	edium	Medium	Medium	Medium	Medium	Medium	Medium	
PSA fee increases substantially, placing significant financial pressure on HCPC (pre-mit 12)	ance Director	Consider increase in tees	Legislative and operational adjustments	-	Medium	Me	edium							
Loss or significant change to funding, 7.6 commissioning and placement opportunities for approved programmes	ector of Education	Operational processes (approval, monitoring and complaints about an approved programme)	Partnerships with Visitors and professional groups.	Regular training of employees and visitors	Medium									

Risks listed in order of CURRENT RISK SCORE, then PRE\_MITIGATION SCORE

DOCUMENT CONTROL: Reference Risk Treatment Plan. Version Jul 2016 Version 1.0

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#### Changes since the previous iteration of HCPC's Risk Register

Category	Ref#	Description	Nature of change in this version
Strategic	1.4	Update Mitigation I	Add word effective
	1.4	Update Mitigation II	Add phrase "at all levels of the organisation"
	1.6	Update Mitigation II	Add "and Council"
	1.7	Update Mitigation I	Add "Council members and partners"
	1.7	Update Mitigation II	Add "Council members and partners"
Operations	2.11	Update Mitigations II & III	Add Descaling and Non return valves option
	2.x	Change Facilities Manager to Office Services Manager	Update job title throughout
Corporate Governance	4.1	Update Mitigation III	Change to "Robust & effective recruitement process"
	4.4	Update Mitigation III	Add "Robust discussion at annual appraisal"
	4.6	Update Mitigation III	Add "External appraisal and effective feedback from fellow Council members"
	4.9 & 4.11	Update Mitigation II	Change Extranet to iPad
	4.16	Update Mitigation III	Change to Effective engagement with PSA throughout process
Policy & Standards	14.2	Add Commisioned research to 14.2	Add Commisioned research to mitigation I of 14.2
		Information Security Management System risks	ISMS Controls indicated for information security ricks
App ii Risk Matrix defns		Historic financial impact levels removed from Risk Matrix defns	Remove greyed out values
App iii Strat Obj		Strategic Objectives mapped to indivudual risks	Add risk per Strategic Objective where specified

#### Overview of Risk Management and Risk Treatment process

Throughout the year exisiting risks are continually monitored and assessed by Risk Owners against Likelihood, and Impact on HCPC, the effectiveness of mitigations and the levels of residual risk.

Future risks are also documented, evaluated and monitored against the same criteria.

Every six months these changes and additions to risks are updated in the risk register and formally documented by the Director of Operations or Head of Business Process Improvement, and the Top Ten Risks (High & Medium only after mitigation) are recorded.

Individual risks are linked to the current Statement of Applicability by the ISO27001 Clauses noted in the ISMS Risks column on each page. Strategic Objectives are linked to individual risks where applicable.

Strategic

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)		Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
1	Strategic		1.1	HCPC fails to deliver SI Sec 6.2 & Health Bill	Council	5	1	5	Delivery of HCPC Strategy	I Publication of Annual Report	Ensure Strategic Intent is up to date	Low	Low
				Links to 7.1-7.4, 8.1-8.2, 10.4, 10.5, 11.4, 15.9									
	Strategic		1.2	Unexpected change in UK legislation	Chief Executive	5	2	10	Relationship with Government depts	Enviromental scanning	-	Low	Low
	Strategic	I A5, 18	1.3	Links to 2.2, Incompatible SI Sec 6.2 & Health Bill and EU legislation	Chief Executive	1	3		Monitoring of EU directives e.g. Professional Qualifications Directive	Membership of Alliance of UK Health Regulators on Europe (lobby group)	-	Low	Low
	Strategic		1.4	Failure to maintain a relationship with PSA	Chief Executive & Chair	5	1	5	HCPC Chair and Chief Executive effective relationship with PSA	Communications at all levels of the organisation	-	Low	Low
	Strategic	I A5,	1.5	Loss of reputation	Chief Executive & Chair	5	3	15	Quality of governance procedures	If it ality of operational procedures	Dynamism and quality of Comms strategy	Medium	Medium
	Strategic		1.6	Failure to abide by current Equality & Diversity legislation	Chief Executive	4	2	8	Equality & Diversity scheme	remployees. Implementation of scheme	Equality & Diversity working group	Low	Low
	Strategic		1.7	Failure to maintain HCPC culture	Chief Executive	5	2	10	Behaviour of all employees, Council members and partners	Induction of new employees, Council members and partners	Internal communication	Low	Low
	Strategic		1.8	Transfer of SW (England) from HCPC to New Reg	Chief Executive	5	3	15	Major ProjectRisk Register	Managed timetable	Project Plan experience	Medium	Medium

**Operations** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
2	Operations	I A11, 17.2.1	2.1	Inability to occupy premises or use interior equipment	Office Services Mgr	4	4	16	Invoke Disaster Recovery/Business Continuity plan	Commercial combined insurance cover (fire, contents, terrorism etc)	-	Low	Low
	Operations		2.2	Rapid increase in registrant numbers	Chief Executive and EMT	3	4	12	Scaleable business processes and scalable IT systems to support them	Influence the rate at which new professions are regulated	-	Low	Low
	Operations		2.3	Links to 1.2, 13.4 Unacceptable service standards	Director of Operations	5	4	20	ISO 9001 Registration, process maps, well documented procedures & BSI audits	Hire temporary employees to clear service backlogs	Detailed workforce plan to match workload.	Low	Low
				Links to 9.1, 10.4									
	Operations		2.4	Inability to communicate via postal services (e.g. Postal strikes)	Office Services Mgr	3	3	9	Use of other media including Website, newsletter & email and courier services	Invoke Business Continuity Plan	Collection of >80% income fees by DD	Medium	Medium
	Operations		2.5	Public transport disruption leading to inability to use Park House	Office Services Mgr & Head Bus Proc	4	5	20	Contact employees via Business Continuity Plan process	Make arrangements for employees to work at home if possible	-	Low	Low
	Operations	ı	2.6	Inability to accommodate HCPC	Office Services Mgr	4	3	12	Ongoing Space planning	Additional premises purchase or rented	-	Low	Low
		A11		employees Links to 5.2	omee connecting.				ongoing opace planning	, talilona, promises parenase er temes		2011	20.11
	Operations	I A11.2.2	2.7	Interruption to electricity supply	Office Services Mgr	4	4	16	Relocate to other buildings on site	If site wide longer than 24 hours invoke BCM/DR Plan	-	High	High
	Operations		2.8	Interruption to gas supply	Office Services Mgr	1	2	2	Temporary heaters to impacted areas	-	-	Low	Low
	Operations		2.9	Interruption to water supply	Office Services Mgr	2	2	4	Reduce consumption	Temporarily reduce headcount to align with legislation	Invoke DR plan if over 24 hrs	Low	Low
	Operations		2.10	Telephone system failure causing protracted service outage	Director of IT	4	3	12	Support and maintenance contract for hardware and software of the ACD and PABX		Diverse routing for the physical telephone lines from the two exchanges with different media types	Low	Low
	Operations	I A11, 17	2.11	Basement flooding	Office Services Mgr	4	4	16	Flood barrier protection to prevent ingress	Periodic descaling of drainage	Investigate benefits of Non Return valves in drain gratings.	Medium	Medium
	Operations		2.12	Significant disruption to UK transport network by environmental extremes e.g . snow, rain, ash; civil unrest or industrial action; disrupts planned external activities	Director of Operations & Head Bus Proc	3	2	6	Use of alternate networks	Use of video or teleconferencing facility to achieve corum	Invoke Disaster Recovery/Business Continuity plan	Low	Low
	Operations		2.14 (formerl y11.5)	Health & Safety of employees	Chief Executive & Office Services Mgr	5	4	20	Health & Safety Training, policies and procedures	H&S Assessments	Personal Injury & Travel insurance	Low	Low
	Operations		2.15	Expenses abuse by Partners not prevented	Director of FTP, Director of Education, Head of Registration, Partner Manager	1	2	2	Clear and appropriate Partner Expenses policy	Sign off by "user" departments	Planned travel supplier only policy in near future	Low	Low

Communications

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
3	Communications		3.1	Failure to inform public Article 3 (13)	Director of Comms	5	1	5		Delivery of aspects of communications workplan, specifically public information campaigns, multi media advetising, distribution of public information materials, and web.	-	Low	Low
	Communications		3.2	Loss of support from Key Stake holders including professional bodies, employers or government	Director of Comms	5	3	15	Delivery of communications strategy, supporting the HCPC strategy	Delivery of aspects of communications work plan, specifically stakeholder activities	Quality of Operational procedures	Low	Low
				Links to 1.5									
	Communications		3.3	Inability to inform stakeholders following crisis	Director of Comms	4	1	4	Invoke Business Continuity Plan (BCP)	Up to date Comms BCP available	-	Low	Low
	Communications		3.4	Failure to inform Registrants Article 3 (13)	Director of Comms	5	1	5	Delivery of communications strategy	Delivery of aspects of communications workplan, specifically, Meet the HCPC events, campaigns, Registrant Newsletter, Profesional media and conference attendance . Publications and web.	Quality of Operational procedures	Low	Low
	Communications		3.5	Publication of material not approved for release	Director of Comms	4	2	8	Delivery of communications plan	Adherence to ISO9001 processes	Adherence to operational plans, eg forward planner	Low	Low
	Communications		3.6	Failure to achieve engagement in the four home countries	Director of Comms	?	?		Delivery of communications plan	Networking with Home Country Departments of Health		Low	New

**Corporate Governance** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
4	Corporate Governance		4.1	Council inability to make decisions Links to 4.4	Director of Council & Committee Services, & Chair	3	1	3	Regular meetings, agendas and clear lines of accountability between Council and committees	Well researched and drafted decision papers at meetings	Robust and effective recruitement process	Low	Low
	Corporate Governance		4.2	Council members conflict of interest	Chair	4	3	12	Disclosure of members' interests to the Secretariat and ongoing Council & committee agenda item	Annual reminder to update Register of Interests	Member induction and training	Low	Low
	Corporate Governance		4.3	Poor Council decision-making due to conflicting advice or decision process	Chair	4	1	4	Well-researched & drafted decision papers, Clear lines of accountability and scheme of delegation	Chair facilitates well reasoned decisions	Attendance by external professionals, as required.	Low	Low
	Corporate Governance		4.4	Failure to meet Council/Committee quorums / failure to make quorate decisions	Director of Council & Committee Services	4	3	12	Clear communication of expectations of Council members' duties upfront	Adequate processes notifying Council & committee members of forthcoming meetings prior to meeting icluding confirmation of attendance	Robust discussions at annual appraisal	Low	Low
	Corporate Governance		4.5	Links to 4.1  Members' poor performance	Chair	4	1	4	Appointment against competencies	Annual appraisal of Council members	Removal under Sch 1, Para 9(1)(f) of the HSWPO 2001	Low	Low
	Corporate Governance		4.6	Poor performance by the Chair	Council	5	1	5	Appointment against competencies	Power to remove the Chair under Sch 1, Article 12(1) C of the HSWPO 2001	External appraisal and effective feedbak from fellow Council members	Low	Low
	Corporate Governance		4.7	Poor performance by Chief Executive	Chair	5	1	5	Performance reviews and regular "one to ones" with the Chair	Contract of Employment	-	Low	Low
	Corporate Governance		4.8	Improper financial incentives offered to Council members/employees	Chair and Chief Executive	4	2	8	Gifts & Inducements policy	Council member code of conduct	Induction training re:adherence to Nolan principles & Bribery Act 2010	Low	Low
	Corporate Governance		4.9	Failure to ensure the Health & Safety of Council Members ? Should this be HCPC wide?	Director of Council & Committee Services , Office Services Mgr & Finance Director	4	2	8	Safety briefing at start of each Council or Committee meeting.	H&S information on Council iPads	Personal Injury and Travel insurance	Low	Low
	Corporate Governance		4.10	Links to 6.3  Establishing appropriately constituted Council	Chair	4	2	8	Robust and effective recruitment process	Use of skills matrix in recruitment exercise	Induction of Council members	Low	Low
	Corporate Governance		4.11	Links to 6.1, 11.13  Expense claim abuse by members	Director of Council & Committee Services	4	2	8	Members Code of Conduct (public office)	Clear and comprehensive Council agreed policies posted on the Council member lpads and made clear during induction	Budget holder review and authorisation procedures	Low	Low
	Corporate Governance		4.12	To ensure Section 60 legislation is operationalised effectively	Council	5	2	10	Scheme of delegation	Council Reporting	Quality Management Processes (ISO9001)	Low	Low
	Corporate Governance		4.13	Failure to comply with DPA 1998 or FOIA 2000, leading to ICO action	Director of Council & Committee Services	3	3	9	Legal advice	Clear ISO processes	Department training	Low	Low
	Corporate Governance	I A18.1.1	4.15	Failure to adhere to the requirements of the Bribery Act 2010	Chair, & Director of Council & Committee Services	4	2	8	Suite of policies and processes related to the Bribery Act	Quality Management Systems	Oversight of EMT, Internal Audit & External Audit	Low	Low
	Corporate Governance		4.16	PSA fails to recommend appointment of Council members to the Privy Council	Director of Council & Committee Services	1	5	5	Sign off of high level process by Council	PSA comments on advance notice of intent acted on appropriately	Effective engagement with PSA throughout process	Low	Low
	Corporate Governance		4.17	Failure to meet requirements of the constitution order	Director of Council & Committee Services	3	1	3	Scrutiny of advance notice of intent	Targeted advertising strategy	-	Low	Low

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Information Technology

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)		Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
5	ΙΤ	I A12,13,14, 9			Director of IT	4	5	20	Anti-virus software deployed at several key points.Application of security patches in a timely manner		Regular externally run security penetration tests.	Low	Low
	ΙΤ	I A12,14, 17.1, 14	F 2	(Hard/SoftWare)	Director of IT	2	2	4	Delivery of the IT strategy including the refresh of technology.	Employ small core of mainstream technology with recognised support and maintenance agreements	Accurately record technology assets.	Low	Low
	ΙΤ	I A9,8,13	5.3	services	Director of IT	3	3	9	Appropriate and proportionate access restrictions to business data. System audit trails.		Regular externally run security tests.	Low	Low
	IΤ	I A17, 14,12	5.4	Links to 10.2 and 17.1  Failure of IT Continuity Provision	Director of IT	4	3	12	Annual IT continuity tests	service changes or a new service is	Appropriate and proportionate technical solutions are employed. IT technical staff appropriately trained.	Low	Low
	IΤ	I A9.4, 9.2, 7		Malicious damage from unauthorised access	Director of IT	4	5	20	Security is designed into the IT architecture, using external expert consultancy where necessary	Regular externally run security penetration tests.	Periodic and systematic proactive security reviews of the infrastructure. Application of security patches in a timely manner. Physical access to the IT infrastructure restricted and controlled.	Low	Low
	IT	I A11.2.2 A17.1.2	5.6	Data service disruption (via utility action)	Director of IT	5	1	5	Redundant services	Diverse routing of services where possible	Appropriate service levels with utility providers and IT continuity plan	Low	Low

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**Partners** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
6	Partners		6.1	Inability to recruit and retain suitable Partners	Partner Manager	3	3	9	Targetted recruitment strategy.	Appropriate fees for partner services and reimbursement of expenses.	Efficient and effective support and communication from the Partner team.	Low	Low
	Partners		6.2	Links to 4.10, 11.3, 7.3,  Incorrect interpretation of law by Partners resulting in PSA review	Director of FTP, Director of Education, Head of Registration, Partner Manager	2	4	8	Partner training and newsletters	Legal Advice	Regular appraisal system	Low	Low
	Partners		6.3	Health & Safety of Partners	Partner Manager	3	2	6	H&S briefing at start of any HCPC sponsored event.	Liability Insurance	-	Low	Low
	Partners		6.4	Partners poor performance and / or conduct	Director of FTP, Director of Education, Head of Registration, Partner Manager	4	3	12	Regular training	Regular appraisal system	Partner Complaints Process & Partner Code of Conduct	Low	Low
	Partners		6.5	Incorrect interpretation of HSWPO by HCPC in use of Partners	Director of FTP, Director of Education, Head of Registration, Partner Manager	3	2	6	Legal Advice	Clearly defined Quality Management processes and policies	Correct selection process and use of qualified partners	Low	Low
	Partners		6.6	Adequate number and type of partner roles	Partner Manager, Director of FTP, Director of Education, Head of Registration	3	2	6	Regular review of availability of existing pool of partners to ensure requirements are met.	Annual forecasting of future partner requirements to ensure that they are budgetted for.	Rolling partner agreements across professions for Panel Member and Panel Chair to ensure adequate supply in line with the eight year rule.	Low	Low
	Partners		6.7	User departments using non- active partners	Partner Manager, Director of FTP, Director of Education, Head of Registration	3	3	9	Notification of partner resignations to user departments.	Current partner lists available to user departments on shared drive.	Daily Email notificaton of partner registrant lapse	Low	Low
	Partners		6.8	Expense claim abuse by Partners	Partner Manager, Director of FTP, Director of Education, Head of Registration	2	2	4	Budget holder review and authorisation process	Comprehensive Partner agreement	Challenge of non standard items by, Finance department and Partner Department	Low	Low

Education

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jul 2015
7	Education		7.1	Failure to detect low education providers standards	Director of Education	4	2	8	Operational processes (approval, monitoring and complaints about an approved programme)	Regular training of employees and visitors	Memorandums of understandings with other regulators (e.g. CQC and Care Councils)	Low	Low
	Education		7.2	Education providers disengaging with process  Links to 1.1	Director of Education	3	3	9	Legal powers (HSWPO 2001)	Delivery of Education Dpt supporting activities as documented in regular work plan	Stakeholder monitoring	Low	Low
	Education		7.3	Inability to conduct visits and monitoring tasks	Director of Education	4	2	8	Adequate resourcing, training and visit scheduling	Approvals & monitoring processes	Temporary staff hire to backfill or clear work backlogs	Low	Low
	Education		7.4	Links to 1.1, 6.1, 11.2 & 11.3  Loss of support from Education  Providers	Chief Executive or Director of Education	5	2	10	Delivery of Education strategy as documented in regular work plan	Partnerships with Visitors and professional groups.	Publications, Newsletters, website content, inclusion in consultations and relevant PLGs, consultations with education providers	Low	Low
	Education	I A12,13,14 15		Links to 1.1, 14.2  Protracted service outage following Education system failure	Director of IT	4	2	8	Effective backup and recovery processes	In house and third party skills to support system	Included in future DR/BC tests	Low	Low
	Education		7.6	Loss or significant change to funding, commissioning and placement opportunities for approved programmes	Director of Education	3	4	12	Operational processes (approval, monitoring and complaints about an approved programme)	Partnerships with Visitors and professional groups.	Regular training of employees and visitors	Med	Low
	Education		7.7	Monitoring processes not effective	Director of Education	3	2	6	Well documented processes	Trained executive & visitors	Communication with education providers	Low	NEW

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**Project Management** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the on-going risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
8	Project Management		8.1	Fee change processes not operational by required date	Director of Finance Project Portfolio Manager	3	3	9	Project is managed as part of major projects portfolio & managed in accordance with HCPC Project Management process	Project progress monitored by EMT & stakeholders	-	Low	Low
	Project Management		8.2	Links to 1.1, 15.3  Failure to regulate a new profession or a post-registration qualification as stipulated by legislation	Project Lead Project Portfolio Manager	5	2	10	Project is managed as part of major projects portfolio & managed in accordance with HCPC Project Management process	Project progress monitored by EMT & stakeholders	Assess lessons to be learned from previous projects	Low	Low
				Links to 1.1, 15.3									
	Project Management	I A14, 15	8.13	Failure to build a system to the the Education departments requirements	Director of Education Project Portfolio Manager	3	4	12	Project is managed as part of major projects portfolio & managed in accordance with HCPC Project Management process	Project progress monitored by EMT & stakeholders	Ensure robust testing including load	Low	Low
	Project Management	I A14, 15	8.14	Failure to deliver a system to the HR & Partners departments requirements	Director of HR Project Portfolio Manager	3	4	12	Project is managed as part of major projects portfolio & managed in accordance with HCPC Project Management process	Project progress monitored by EMT & stakeholders	Project Initiation stage to pay particular attention to project scope and breadth/reach of project	Low	Low
	Project Management	I A7.2.1	8.17	Organisation wide resourcing may impact project delivery	EMT & Project Portfolio Manager	3	4	12	Manage resources accordingly	Accept changes to planned delivery		Med	Med
	Project Management	I A14, 15	8.19	Failure to build a system to the Registrations department's requirements	Director of Operations & Project Portfolio Manager	5	4	20	Project is managed as part of major projects portfolio & managed in accordance with HCPC Project Management process	Project progress monitored by EMT & stakeholders	Ensure robust testing including load	Low	Low

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**Quality Management** 

Re	f	Category	ISMS Risks	Ref#		Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
g	)   1	Quality Management.		9.1	Loss of ISO 9001:2008 Certification	Director of Operations, Head of Business Improvement	4	3	12	Regular & internal audits	QMS standards applied across HCPC	Management buy - in	Low	Low
	ı	Quality Management.	I A7.1.2	9.2	Links to 2.3, 10.3  Employees non-compliance with established Standard Operating Proceedures	ЕМТ	5	2	10		Standard Operating Procedures and prevention of overwriting systems	Extend ISO systems as required	Low	Low

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Registrations

Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
Registration				Director of Operations, Head of Registration	5	4	20	Accurate staffing level forecasts	Adequate staff resourcing & training	infrastructure eg call centre systems, NetRegulate system enhancements, registration re-	Low	Low
Registration		10.2	Protracted service outage following a NetRegulate Registration system failure	Director of IT	5	3	15	Effective backup and recovery procedures	Maintenance and support contracts for core system elements.	Annual IT Continuity tests	Low	Low
Registration		10.3	Inability to detect fraudulent	Director of Operations, Head of Registration	5	2	10	Financial audits, system audit trails	Policy and procedures supported by internal quality audits	Validation of submitted information, Education & ID checks. NHS Protect fraud measurement exercises ongoing	Low	Low
Registration		10.4	Backlogs of registration and applications	Director of Operations, Head of Registration	4	3	12	Continually refine model of accurate demand- forecasting, to predict employees required to prevent backlogs, and service failures			Low	Low
Registration		10.5	Mistake in the Registration process leading to liability for compensation to Registrant or	Director of Operations, Head of Registration	5	2	10	Audits by Registration Management, system audit trails, external auditors			Low	Low
Registration		10.6 (18.1- 7.5)		Director of Operations, Head of Registration	4	2	8	Well documented processes	Appropriately trained members of the registrations team	Monitor and regular feedback to the Education & Training Committee	Low	Low
Registration			Failure to manage Registration	Director of Operations, Head of Registration	4	2	8	Well documented processes	Appropriately trained members of the registrations team	Monitor and regular feedback from the Reg Appeals panel	Low	Low
	Registration  Registration  Registration  Registration	Registration  Registration  Registration  Registration  Registration  Registration	Category       Risks       Ref #         Registration       10.1         Registration       10.2         Registration       10.3         Registration       10.4         Registration       10.5         Registration       10.6 (18.1-7.5)         Paginteration       10.7	Category       Risks       Ref #       Description         Registration       10.1       Customer service failures         Links to 11.1, 11.2       Protracted service outage following a NetRegulate Registration system failure         Links to 5.1-5.3 and 17.1       Links to 5.1-5.3 and 17.1         Registration       10.3       Inability to detect fraudulent applications         Links to 9.1, 17.1 and 17.2       Links to 9.1, 17.1 and 17.2         Registration       Links to 1.1       Mistake in the Registration process leading to liability for compensation to Registrant or Applicant         Registration       10.6 (18.1-7.5)       CPD processes not effective         Links to 1.1       Links to 1.1	Category   Risks   Ref #   Description   Director of Operations, Head of Registration	Category   ISMS   Ref #   Description   Director of Operations, Head of Registration   10.1   Customer service failures   Director of Operations, Head of Registration   5	Category   Risks   Ref #   Description   D	Category   SIAMS   Ref #   Description   Director of Operations, Head of Registration   10.1   Customer service failures   Director of Operations, Head of Registration   10.2   Protracted service outage following a NetRegulate Registration   10.3   Inability to detect fraudulent applications   Director of Operations, Head of Registration   10.3   Inability to detect fraudulent applications   Director of Operations, Head of Registration   10.4   Backlogs of registration and applications   Director of Operations, Head of Registration   10.5   Director of Operations, Head of Registration   Director of Operations, Head of Registration   10.5   Director of Operations, Head of Registration   10.6   Director of Operations, Head of Registration   10.6   Director of Operations, Head of Registration   Director of Operations, Head of Registration   10.5   Director of Operations, Head of Registration   Director o	Person responsible for assessing and ranging the ongoing risk)   Person responsible for managing the ongoing risk)   Person responsible for managing the ongoing risk)   Person responsible for mitigations Jul 2016   Person responsible for mitigations	Part   Category   Part   Par	Pregistration Registration 10.3 Inching to 11.1 1.1 2  Registration 10.4 1.0 1.0 Lines to 11.1 1.1 2  Registration 10.5 Inching the support of the lines of the l	Project of Comments   Project of Comments

#### THE HEALTH AND CARE PROFESSIONS COUNCIL

RISK ASSESSMENT & RISK TREATMENT PLAN July 2016

HR

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)		Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
11	HR		11.1	Loss of key HCPC employees, excluding Chief Exec	Chair, Chief Executive and EMT	3	2	6	Organisation succession plan held by Chief Executive and HR Director.	Departmental training (partial or full) and process documentation	Informal department level succession plans	Low	Low
	HR		11.2	High turnover of employees	HR Director	3	3	9	Remuneration and HR strategy		Exit interview analysis and employee survey analysis	Low	Low
	HR			Links to 11.3 Inability to recruit suitable employees Links to 4.10, 6.1, 11.2, 11.8	HR Director	3	3	9	Recruitment strategy and adequate resourcing of the HR dept	Careful specification of recruitment adverts and interview panel selection	Hire skilled temporary employees in the interim	Low	Low
	HR		11.4	Lack of technical and managerial skills to delivery the HCPC strategy	Chief Executive	4	2	8	HR strategy and Performance and Development management; -Buy in skills -Upskilling employees on the job -Training		Some projects or work initiatives delayed or outsourced	Low	Low
	HR		11.6	Links to 1.1 High sick leave levels	EMT	2	2	4	Adequate employees (volume and type) including hiring temporary employees	Return to work interviews and sick leave monitoring	Regular progess reviews	Low	Low
	HR		11.7	Employee and ex-employee litigation	HR Director	4	3	12	Line manager training	Keeping HR policies and processes in line with employment legislation	Employee surveys, Exit Interviews, Employee Assistance Programme, Management Development Programme.	Low	Low
	HR	I A7, 8	11.8	Employer/employee inappropriate behaviour	HR Director	2	2	4	Whistle blowing policy, Code of Conduct & Behaviour	Other HR policies and procedures	Employee Assistance programme	Low	Low
	HR		11.9	Links to 11.3  Non-compliance with  Employment legislation	HR Director	4	2	8	Up to date HR policies and processes in line with employment legislation.	Obtain legislation updates and legal advice	HR training for managers	Low	Low
	HR		11.10	Loss of Chief Executive & Registrar	Chair	5	2	10	Succession Plan	Development of internal Executive team	Good communication with Chair	Low	Low
				Includes Auto enrolment pensions									

Includes Auto enrolment pensions

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### THE HEALTH AND CARE PROFESSIONS COUNCIL RISK ASSESSMENT & RISK TREATMENT PLAN July 2016

Legal

Ref	Category	ISMS Risks	Ref#	Description		Impact before mitigations Jul 2016		Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
12	Legal		12.1	Judicial review of HCPC's implimentation of HSWPO including Rules, Standards & Guidance	Chief Executive	5	3	15	Consultation. Stds determined by PLG's. Agreement by Council.	Appropriate legal advice sought	-	Medium	Medium
				Links to 1.2, 14.1, 14.2									
	Legal	I A18		Legal challenge to HCPC operations	Chief Executive	4	4	16	Legal advice and ISO	Pre-emptive and on-going communications concerning legal basis and implimentation of the HSWPO	-	Low	Low

**Fitness to Practise** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
13	Fitness to Practise		13.1	Legal cost over-runs	FTP Director	4	4	16	Contractual and SLA arrangements with legal services providers(s)		Quality assurance mechanisms	Low	Low
	Fitness to Practise			Links to 13.4, 15.2  Tribunal exceptional costs	FTP Director	5	5	25	Quality of operational processes	Accurate and realistic forecasting	Quality of legal advice	Medium	Medium
	Fitness to Practise			Rapid increase in the number of allegations and resultant legal costs	FTP Director	4	4	16	Accurate and realistic budgeting	Resource planning	-	Medium	Medium
	Fitness to Practise		13.5	Links to 13.1 Witness non-attendance	FTP Director	4	2	8	Vulnerable witness provisions in the legislation	Witness support programme	Witness summons	Low	Low
	Fitness to Practise	ı	13.6	Employee/Partner physical assault by Hearing attendees 13.7 moved to 10.7	FTP Director	5	5	25	Risk Assessment Processes		Periodic use of security contractors and other steps	Low	Low
	Fitness to Practise			Backlog of FTP cases	FTP Director	3	4	12	Reforecasting budget processes	Monthly management reporting	Quality of operational processes	Low	Low
	Fitness to Practise			Excessive cases per Case Manager workload	FTP Director	3	4	12	Reforecasting budget processes		Resource planning & Quality of operational processes	Low	Low
	Fitness to Practise	I A12,13, 14, 16, 17	13.10	13.2 moved to 12.2  Protracted service outage following a Case Management System failure	Director of IT	5	3	15	Effective backup and recovery procedures	Maintenance and support contracts for core system elements	Annual IT continuity tests	Low	Low

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Policy & Standards

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)		Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
14	Policy & Standards		14.1	Incorrect process followed to establish stds/guidance/policy eg no relevant Council decision	Policy & Stds Director	4	2	8	Legal advice and sign off sought on processes	Appropriately experienced and trained members of Policy team.	Quality mgt system & processes	Low	Low
				Links to 12.1									
	Policy & Standards		14.2	Inappropriate stds/guidance published eg stds are set at inappropriate level, are too confusing or are conflicting	Council/committees	4	1	4	Use of commissioned research, professional liaison groups, and Council and committees including members with appropriate expertise	Appropriately experienced and trained members of Policy team.	Consultation with stakeholders & legal advice sought	Low	Low
	Policy & Standards			Changing/evolving legal advice rendering previous work inappropriate	Policy & Stds Director	4	2	8	Use of well-qualified legal professionals. Regular reviews.	Legal advice obtained in writing.	Appropriately experienced and trained members of Policy team and others eg HR.	Low	Low
	Policy & Standards		14.4	Inadequate preparation for a change in legislation (Health Professions Order, or other legislation affecting HCPC)	ЕМТ	3	1	3	EMT responsible for remaining up to date relationships with governemnt depts and agencies.	HCPC's 5 year planning process	Legal advice sought	Low	Low
	Policy & Standards			, ,	Policy & Stds Director HCPC Chair, Director of Council & Committee Services(?)	4	1	4	Skills and knowledge identified in work plan	Recruitment policy	Council Scrutiny of PLG result	Low	Low
	Policy & Standards				Policy & Stds Director	3	3	9	Maintain appropriate records of project decisions	Appropriate hand over and succession planning	Department training	Low	Low

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Finance

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jul 2016	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
15	Finance		15.1	Insufficient cash to meet commitments	Finance Director	5	1	5	Reserves policy specifies minimum cash level to be maintained throughout the year. Cash flow forecast prepared as part of annual budget and 5 year plan assesses whether policy minimum level will be met.		Fee rises and DoH grant applications as required.	Low	Low
	Finance		15.2	Unexpected rise in operating expenses	ЕМТ	4	1	4	Budget holder accountability for setting budgets and managing them. Timely monthly reporting and regular budget holder reviews held. EMT review of the monthly variances year to date.	Six and nine month reforecasts with spending plan revisions as feasible and appropriate. FTP costs mainly incurred towards the end of the lifecycle of a case, so increase in case pipeline would give early warning of rise in FTP costs.	Capped FTP legal case costs.	Low	Low
	Finance		15.3	Link to 13.1  Major Project Cost Over-runs	Project Lead / EMT	4	2	8	Effective project specification including creating decision points. Effective project management and timely project progress reporting (financial and non financial).	Project budgets have 15% contingency. Project exception reports including revised funding proposal is presented to EMT for approval.	EMT review of the project spending variances to date	Low	Low
	Finance	I A7, 8, 9	15.7	Registrant Credit Card record fraud/theft	Finance Director	2	2	4	Compliance with PCI standards.	Limited access to card information	Professional Indemnity & fidelity (fraud) insurance for first £250k of loss	Low	Low
	Finance		15.9	Links to 5.3  Mismatch between Council goals & approved financial budgets	Chief Executive	4	2	8	Close and regular communication between the Executive, Council and its Committees.	Adequate quantification of the budgetary implications of proposed new initiatives	Use of spending prioritisation criteria during the budget process	Low	Low
	Finance	I A8, 11,	15.12	Links to 1.1  Unauthorised removal of assets (custody issue)	Office Services Mgr & IT Director	2	2	4	Building security including electronic access control and recording and CCTV. IT asset labeling & asset logging (issuance to employees)	Fixed Asset register itemising assets. Job exit procedures (to recover HCPC laptops, blackberries, mobile phones etc). Regular audits. Whistleblowing policy.	Computer asset insurance.	Low	Low
	Finance	I A8, 11,	15.13a	Theft or fraud	Finance Director	3	2	6	Well established effective processes, incl segregation of duties and review of actual costs vs budgets.	Regular audits; whistleblowing policy	Professional Indemnity & fidelity (fraud) insurance for first £250k of loss	Low	Low
	Finance		15.18	Incorporates aspects of previous ri PAYE/NI/corporation tax compliance	Finance Director	2	3	6	Effective payroll process management at 3rd party. Finance staff attend payroll & tax updates	Professional tax advice sought where necessary, including status of CCMs and partners	PAYE Settlement Agreement in place with HMRC relating to Category One Council and Committee members.	Low	Low
	Finance		15.20	Bank insolvency: permanent loss of deposits or temporary inability to access deposits	Finance Director	5	1	5	Investment policy sets "investment grade" minimum credit rating for HCPC's banks and requires diversification - cash spread across at least two banking licences			Low	Low
	Finance		15.21	Financial distress of key trade suppliers causes loss of business critical service	Finance Director	4	2	8	Financial health of new suppliers above OJEU threshold considered as part of OJEU PQQ process. Ongoing financial monitoring of key suppliers	Escrow agreements	Alternative suppliers where possible, eg transcription services framework	Medium	Medium
	Finance		15.22	Payroll process delay or failure	Finance Director	2	2	4	Outsourced to third party. Agreed monthly payroll process timetable (with slack built in). If process delayed, payment may be made by CHAPS (same day payment) or cheque.	Hard copy records held securely. Restricted system access.	3	Low	Low
								·					

**Finance** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	<u> </u>	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
	Finance			Failure to apply good procurement practice (contracts below OJEU threshold) leads to poor value for money and/or criticism	Finance Director & Procurement Mgr	2	2		1 1 1 1	Internal monitoring of Tendering and contract process use.	New suppliers process as "backstop" to failure.	Low	Low
	Finance		15.25	Failure to adhere to OJEU Procurement and Tendering requirements leads to legal challenge and costs	Finance Director & Procurement Mgr	4	2	×	Use Framework Agreements as standard practise at HCPC	Robust OJEU specific processes agreed by legal advisors. Legal oversight of OJEU related material created by HCPC	Legal oversight of OJEU scoring and supplier communication	Low	Low
	Finance		15.26	Budgeting error leads to overcommitment of funds	Finance Director	4	2	8	Income and FTP costs are budgeted for on FAST standard models. Payroll costs are budgeted for post by post. Cautious assumptions used in relation to income and payroll.	Budgets are prepared by departments and then reviewed by Finance. Budgets for coming year baselined vs current year budget and forecast	Budgets are discussed/challenged by EMT at annual pre-budget setting review	Low	Low
	Finance		15.27	Payment error leads to irrecoverable funds	Finance Director	3	2	6	Extensive use of preferred suppliers with bank account details loaded into Sage.	System controls over changing payee bank details	Payment signatory reviews of payment runs	Low	Low
	Finance		15.28	PSA fee increases substantially, placing significant financial pressure on HCPC	Finance Director	4	3	12	Consider increase in fees	Legislative and operational adjustments		Medium	Medium

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**Pensions** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)		Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
16	Pensions		16.2	Non compliance with pensions legislation	Finance Director and HR Director	3	2	6	HCPC pension scheme reviewed for compliance with pensions legislation including auto enrolment	HR and Finance staff briefed on regulations	Advice from payroll provider. s Seek specialist pensions legal advice as required.	Low	Low
	Pensions			Increase in the Capita Flexiplan funding liability resulting from scheme valuation deficiency	Finance Director	3	2	6		Initial employer contributions to the Plan deficit were set on prudent basis	Monitor the performance of the Plan through periodic employers' meetings	Low	Low

**Information Security** 

Ref	Category	ISMS Risks	Ref#	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before	Likelihood before mitigations Jul 2016	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jul 2016	RISK score after Mitigation Jan 2016
17	Information Security	I A6,8,9 12,14	17.1	Loss of information from HCPC's electronic databases due to inappropriate removal by an employee	EMT, Director of IT and Director of Operations	5	3	15	Access is restricted to only the data that is necessary for the performance of the services. Employment contract includes Data Protection and Confidentiality Agreement	Adequate access control procedures maintained. System audit trails. Training where appropriate.	Laptop encryption. Remote access to our infrastructure using a VPN . Documented file encryption procedure . Maintain ISO27001	Low	Low
	Information Security	I A11,8, 7,15,16, 17	17.2	Links to 5.3. Incl old 17.6  HCPC Document & Paper record  Data Security	EMT; Head of Business Improvement	5	3	15	Use of locked document destruction bins in each dept. Use of shredder machines for confidential record destruction in some depts e.g. Finance.	Data Protection agreements signed by the relevant suppliers. Dept files stored onsite in locked cabinets. Training where appropriate (Employees & Partners)	Regarding Reg Appln forms processing, employment contract includes Data Protection Agreement	Low	Low
	Information Security	I A15, 8, 13		Links to 15.7  Unintended release of electronic or paper based information by external service providers.	EMT, Director of IT and Director of Operations	5	3	15	Access is restricted to only the data that is necessary for the performance of the services.	Effective system processes including secure data transfer and remote access granted only on application and through secure methods.	Data Processor agreements signed by the relevant suppliers. Maintain ISO27001	Low	Low
	Information Security	I A18, 15, 13	17.4	Inappropriate data received by HCPC from third parties	Director of Ops, and Director of FTP	5	2	10	Read only, password protected access by a restricted no of FTP employees to electronic KN data.	Registrant payments taken in compliance with Payment Card Industry (PCI) Security standards ie with quarterly PCI testing.	Ensure third party data providers e.g. professional bodies provide the data password protected/encrypted/door to door courier/registered mail/sign in sign out as appropriate.	Low	Low
	Information Security	I A15, 8	17.5	Loss of physical data dispatched to and held by third parties for the delivery of their services	Director of Ops and Hd of Business Process Improv	5	3	15	Data Protection/Controller agreements signed by the relevant suppliers. Use of electronic firewalls by suppliers.	Use of transit cases for archive boxes sent for scanning or copying and sign out procedures.	-	Low	Low
	Information Security	I A9, 12, 13, 15	17.6	Loss of Registrant personal data by the registration system (NetRegulate) application support provider in the performance of their support services (specific risk).	Director of IT and Director of Operations,	5	3	15	Access to and export of personal data is restricted to only that which is necessary for the performance of the services.	Effective system processes including secure data transfer and remote access granted only on application and through secure methods.	Data processor side letter specifying obligations and granting a limited indemnity.	Low	Low
	Information Security	I A8	17.7	Incorrect risk assessment of Information Assets	Hd of Business Process Improv & Asset Owners	4	2	8	Identification and collection of information risk assets	Regular audit and review of information risk assets by Hd of BPI	Regular identification and review of information risk assets by Hd of BPI	Low	Low
	Information Security	I A6, 7, 8, 9	17.8	Loss of personal data by an HCPC Contractor, Partner, Council or Committee member.	ЕМТ	5	3	15	Access to and export of personal data is restricted to only that which is necessary for the performance of the services.	Effective system processes including secure data transfer and remote access granted only on application and through secure methods. Training where appropriate.	Maintain ISO27001	Low	Low
	Information Security	I A5	17.9	Loss of ISO 27001:2013 Certification	Hd of Business Process Improv & Asset Owners	5	4	20	Culture, follow procedures, report errors, training and awareness as required	Standard Operating Procedures and prevention of overwriting systems	Extend ISO systems as required	Med	Med

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Appendix i

#### **Glossary & Abbreviations**

Term Meaning

AGM Annual General Meeting

BCP / BCM Business Continuity Plan / Business Continuity Management (Disaster Recovery and associated processes)

CDT Cross Directorate Team (formerly HCPC's Middle Management Group)

CPD Continuing Professional Development

EEA European Economic Area, = European Economic Union, plus Norway, Iceland, plus for our purposes Switzerland

EMT HCPC's Executive Management Team

EU European Economic Union (formerly known as the "Common Market")

Europa Quality Print Supplier of print and mailing services to HCPC

FReM Financial Reporting Manual FTP Fitness to Practise GP Grandparenting

HSWPO Health and Social Work Professions Order (2001)

HR Human Resources

HW Abbreviation for computer hardware

ISMS I = Information Security Management System (ISMS) risk

Impact The result of a particular event, threat or opportunity occurring. Scored between 1 least effect on HCPC and 5 maximum effect on HCPC.

ISO International Standards Organisation (the global governing body for the Quality standards used by HCPC)

ISO 9001:2008 The ISO Quality Management Standard used by HCPC. ISO 27001:2013 The ISO Information Security Standard used by HCPC.

IT Information Technology

Likelihood Used to mean Probability of the event or issue occurring within the next 12 months

MIS Management Information System MOU Memorandum of Understanding

NetRegulate The bespoke computer application used to manage the application, registration and renewal processes, and publish the online register

OIC Order in Council

OJEU Official journal of the European Union

Onboarding The process of bringing a new profession into statuatory regulation from HCPC's viewpoint

OPS Operations

PSA Formerly (CHRE), renamed Professional Standards Authority for Health and Social Care in the 2012 legislation.

PLG Professional Liason Group

Probability Likelihood, chance of occurring. Not the "mathematical" probability. Scored between 1 least likely and 5 most likely to occur within the next year.

Q = Quality Management System (QMS) Risk

QMS Quality Management System, used to record and publish HCPC's agreed management processes
Risk An uncertain event/s that could occur and have an impact on the achievement of objectives

Risk Owner The person or entity that has been given the authority to manage a particular risk and is accountable for doing so.

Risk Score Likelihood x Impact or Probability x Significance

SI Statutory Instrument
Significance Broadly similar to Impact

SSFS Scheme Specific Funding Standard, a set of standards relating to pensions services

STD Standards

SW Abbreviation for computer software

VPN Virtual Private Network, a method of securely accessing computer systems via the public internet

ISO27001:2013 A5 Security Policy Management ISO27001:2013 A6 Corporate Security Management ISO27001:2013 A7 Personnel Security Management ISO27001:2013 A8 Organizational Asset Management Information Access Management ISO27001:2013 A9 ISO27001:2013 A10 Cryptography Policy Management ISO27001:2013 A11 Physical Security Management **Operational Security Management** ISO27001:2013 A12 ISO27001:2013 A13 **Network Security Management** ISO27001:2013 A14 System Security Management ISO27001:2013 A15 Supplier Relationship Management ISO27001:2013 A16 Security Incident Mangement

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#### Appendix ii

IMPACT

#### HCPC RISK MATRIX

Public Protection	Financial	Reputation						
Catastrophic 5 A systematic failure for which HCPC are ultimately responsible	Catastrophic 5	Catastrophic 5						
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		10	15	20	25	
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.	Significant 4 Unfunded pressures £250,000 - £1 million	Significant 4 Incompetence/ maladministration that will undermine public trust or a key relationship for a sustained period or at a critical moment.	4	8	12	16	20	
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.	Moderate 3 Unfunded pressures £50,000 - £250,000	Moderate 3 Incompetence/ maladministration that will undermine public trust or a key relationship for a short period. Example Policy U-turn	3	6	9	12	15	
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 £20,000 - £50,000	Event that will lead to widespread public criticism.	2	4	6	8	10	
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.	1	2	3	4	5	
KEY			Negligible1	Rare 2	Unlikely 3	Possible 4	Probable 5	
>11 High Risk: Urgent action required			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.	Only small chance of occurring in the lifetime of the strategy.	May well occur during the lifetime of the strategy.	Likely to happen at some point during the next one or two years.	"Clear and present danger", represented by this risk - will probably impact on this initiative - sooner rather than later.	Strategic
6-10 Medium Risk: Some action required			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.	Not likely to occur during the lifecycle of the programme of project.	May occur during the life of the programme or project.	Likely to happen in the life- cycle of the programme or project.	Likely to occur in the life- cycle of the project, probably early on and perhaps more than once.	Programme / Project
<5 Low Risk: Ongoing monitoring required			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.		May well happen on a monthly basis.	May well happen on a weekly basis.	The threat is likely to happen almost every day.	Operational

LIKELIHOOD

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#### **RISK MATRIX DEFINITIONS**

#### **IMPACT TYPES**

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

Strategic	Programme / Project	Operational
Probable 5	Probable 5	Probable 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.
Possible 4	Possible 4	Possible 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.
Unlikely 3	Unlikely 3	Unlikely 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.
Rare 2	Rare 2	Rare 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.
Negligible1	Negligible1	Negligible1
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.

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LIKELIHOOD

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#### **HCPC Strategic Objectives 2016 - 2020**

SO1.GG	Objective 1: Good governance										
	To maintain, review and develop good corporate governance Specific risks; 4.1 to 4.17 inclusive										
SO2.EBP	Objective 2: Efficient business processes										
	To maintain, review and develop efficient business processes throughout the organisation Specific risks; 1.1; 1.2; 1.2; 2.3; 4.1; 4.5; 4.6; 4.7; 4.12; 9.2										
SO3.Com	Objective 3: Communication										
	To increase understanding and awareness of regulation amongst all stakeholders Specific risks; 3.1; 3.2; 3.3; 3.4; 3.5										
SO4.Evid	Objective 4: Build the evidence base of regulation										
	To ensure that the organisation's work is evidence based Specific risks; 14.2										
SO5.IPA	Objective 5: Influence the policy agenda										
	To be proactive in influencing the wider regulatory policy agenda  Specific risks; 1.2; 1.5										
SO6.HmCty	y Objective 6: Engagement in the four countries										
	To ensure that our approach to regulation takes account of differences between the four countries Specific risks;										

# HCPC has an **averse** appetite to risk in that we; a. Identify all relevant risks

- b. Mitigate those risks to an appropriate level
- c. Invest mitigation resources in proportion to the level of risk

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#### **HCPC Risk Assurance mapping**

nord Risk Assurance mapping	> Increasing Assurance															
	AREA C. Management Control & Reporting				AREA B. Functional oversight / Governance	AREA A. Independent review / Assurance / Regulatory oversight										
Key Business Risk areas Assurance Map	Systems Controls	Operational Risk Management	Inter- departmental Quality Assurance	Near Miss Reporting	EMT	Council	Audit Committee	Internal Auditors	External Auditors (NAO)	External Legal Advice	Quality Management System ISO9001	Information Security Management ISO27001	PSA	Penetration Testing	PCI-DSS	Parliamentary oversight
Strategic risks						х	х	х		х						х
Communications		х	x	х	х	х	х	х	х	х	х		х			
Continuing Professional Development	x	x	x	x	х		x			x						
Corporate Governance			x	х	х	х	x	х	x	х	х		х			х
Information Security	x	x	x	x	х		x	х			x	х		x	x	
Education	x	x	x	x	х	х	x	х		x	x		x			
Finance	x	x	x	x	х	х	x	х	x	x	x	х			x	х
Fitness to Practise	x	x	x	x	х	х	x	х		x	x		x			x
HR	x	x	x	х	х	х	x	х		x	x	х				
Information Technology	x	x	x	х	х	х	x	х	x	x	x	х		x		
Legal				х	х	х	x	х		x			x			x
Operations	x	x	x	x	x	x	x	x	x		x		x			
Partner	x	x	x	x	x	x	x	x			x	x	x			
Pensions				x	х	x	×	х		x						
Policy & Standards			x	х	х	х	x	х		х	х		х			x
Project Management	х	х	x	х	х	x	х	х	х		х	х				
Quality Management	х	х	x	х	х	х	х	х			х		х			
Registration	х	х	x	х	х	x	х	х		х	х		х			

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