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### Internal Assurance Report – September 2021

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#### Executive Summary

This paper provides information on internal assurance activities that have taken place since June 2021 and activities that are ongoing in this period. This report includes the following areas

- A – Quality Assurance
- B – Organisational Compliance
- C – Information Governance
- D – Complaints and Feedback

#### Developing the report

A review is underway to bring together various compliance and quality assurance activity across the organisation into one joined together HCPC Assurance Framework based on the new three lines model. Initial planning for the future look has been discussed with the ARAC Chair. We aim to present a new look report at the November ARAC meeting which reflects this work.

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Previous consideration	This is a standing item considered at each meeting of the Committee.
Decision	The Committee is asked to discuss the report.
Next steps	The next report will be received in November 2021.
Strategic priority	Strategy aim 1 – Continuously improve and innovate  Strategy aim 5 – Build a resilient, healthy, capable and sustainable organisation.
Risk	Strategic Risk 1 – Our performance does not improve to a standard that enables us to achieve all the PSA standards of good regulation. In seeking to meet these standards we lose focus and lose standards in other areas.  Strategic Risk 5 – The resources we require to achieve our strategy are not in place or are not sustainable.  Strategic Risk 6 – We are unable to demonstrate the value of regulation due to negative experiences of our regulation in practice.

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Financial and  
resource  
implications

None.

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## A. Quality Assurance

### Quality Assurance department update – September 2021

#### 1. Executive Summary

1.1 This report covers the departmental activities from June 2021 – August 2021.

#### 2 QA Activity

2.1 Since the last update, QA have continued to progress and complete activities on the 2021/22 QA framework successfully.

Completed	In Progress	Up Next
<ul style="list-style-type: none"><li>• Education QA Pilot Advisory Activity, Education</li><li>• Reflective Review of Registration Improvements Project Phase 2, Registration</li><li>• Approved Programmes, Education: <b>LIMITED</b></li><li>• Online CPD, Registration: <b>SATISFACTORY</b></li></ul>	<ul style="list-style-type: none"><li>• Comparable Qualifications List, Registration</li><li>• Education Guidance Documents Review, Education</li><li>• Lean Six Sigma Green Belt Project, Registration</li></ul>	<ul style="list-style-type: none"><li>• Risk Assessment 1st line check assurance, FTP</li><li>• Risk Assessment live audit, FTP</li><li>• Investigation Quality Benchmarking, FTP</li><li>• Failure Mode and Effects Analysis of Approval Process, Education</li></ul>

2.2 In the May ARAC meeting we discussed the CPD audit, and the Chair requested an update was given on the outcome of this QA activity. The Key Findings were:

- ★ 100% of CPD profiles had outcomes that were clear and well communicated to Registrants.
- ★ First line checks by Registration Advisors are very effective and the turnaround time has improved significantly in recent months.
- + Functionality within the Registration System could be utilised more effectively to prevent 'double work' in the future

The QA Team has made two low priority recommendations relating to the following areas:

-  Ensuring that evidence received outside of the Registration system is uploaded manually
-  Liaising with the Education Department to see how functionality in a similar system has been utilised effectively to increase transparency and improve ways of working.

The overall assurance rating was  **Satisfactory**

2.3 There were no **Low** Assurance ratings found since the last update to ARAC

### 3 QA Framework 2021-22

3.1 The QA 2021-22 Framework has been revised following a change to the timing of the FTP Risk Assessment first line check assurance and live audit. The FTP Department requested that they be pushed to September to allow changes to be made to the new FTP system which would impact upon the risk assessment work.

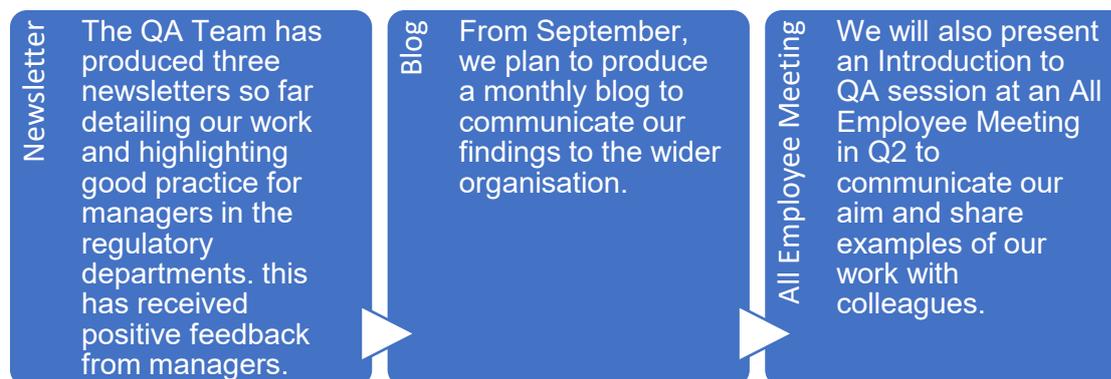
3.2 As a result, the following significant changes have been made to the framework:



### 4 QA team development 2021-22

4.1 The first Lean Six Sigma (LSS) project has commenced. The purpose of this project is to review the International Applications process from a LSS perspective, ensuring it is running as smoothly as possible and to identify opportunities to improve efficiency. An initial meeting has been held with the Executive Director of Regulation, the Head of Registration and the Head of IT and Projects but the scope for this project is still to be confirmed. This project is due to complete in November. This is the first of four LSS Projects that each of the QA Managers and the QA Lead will complete following the LSS Green Belt Practitioner training earlier this year

4.2 The QA Team is beginning to work on an information campaign to raise awareness of the QA Team and its work:



4.3 On a monthly basis, the QA Team are also holding reflective sessions whereby we consider different elements of our process eg scoping, presenting findings, creating a framework for assurance activities. In these sessions, we consider the changes that have been made in the past year, reflect on what is working well and identify areas of development.

## 4 QA Activity

4.1 All QA activities are progressing well according to the QA schedule to date:

QA Activity	Start	PSA	SRR	Status	Assurance	Recommendations and Notes
Health and Wellbeing Strategy and Tone of voice QA are involved in the implementation of the new strategy. This work will involve quality assuring new templates produced through the Tone of Voice review in 21-22 and other areas of the Health and Wellbeing Strategy throughout 21-22.	04/21	3, 18	4, 6	On Hold	n/a	The tone of voice project is on hold and expected to initiate in Q2.
<i>Education:</i> Guidance Review A review of guidance to support the implementation of the new Education QA model.	05/21	5, 9	2, 5, 6	Ongoing	n/a	QA held a workshop with Education on producing accessible and robust guidance. This review is based on the principles agreed in the workshop.
<i>Registration:</i> Reflective Review of Phase 2 RTIP A reflective review of phase 2 of the Registration Transformation and Improvement Project, specifically looking at the build and project management.	03/21	11	4	Completed	n/a	This review has completed, and the findings were reported to ELT, and presented to the Executive Director of Regulation and the Head of Registration in June.
<i>Education:</i> List of Approved Programmes An annual audit to assess the accuracy of newly created programme records, as well as the impact of programme record changes.	04/21	1	4	Completed	Limited	Four recommendations: 3 Medium - 1 Complete, 2 Accepted 1 Low - Accepted
<i>Registration:</i> CPD Online System A review to assess how the CPD process is working following the introduction of an online portal for registrants to submit their profiles.	06/21	13	4, 5, 6	Completed	Satisfactory	Two recommendations: 2 Low - Accepted
<i>Registration:</i> Comparable Qualification List (CQL) Audit An annual audit to provide assurance that applicants who joined the Register via the CQL route hold an appropriate qualification and all required verification checks have taken place.	08/21	10, 11	2, 6	In Progress	n/a	This audit will also ensure that annual monitoring checks in the CQL process have been completed and recorded accurately.
<i>Registration:</i> International applications - Lean Six Sigma (LSS) Review A review of the international application process, using LSS methodology, with a view to improving efficiency as well as the applicants' experience	08/21	11	1, 4	In Progress	n/a	This is the first of four LSS Projects that QA will complete this financial year.



## B. Organisational compliance

### 1. Information security

- An ISMS Board meeting will take place this month, looking at enhancing our capabilities to respond to incidents.
- Information security training continues as new employees start, along with anti-bribery & fraud prevention. Council and Committee members are now being invited to complete this annual training also. Progress is indicated in the graphics below.



- The Risk & Compliance side of Governance have been working with our legal advisors to produce more robust and consistently useable data sharing agreements (DSA's) and shortly, draft memoranda of understanding (MOU's). Governance act as the gatekeepers for information sharing efforts where personally identifiable data is exchanged.
- In the meantime we have completed negotiation with the legal advisors of UK-Reach (a UK wide research project evaluating the apparent ethnicity bias in the covid-19 disease). Anonymised and pseudonymised data will be sent via secure mechanisms shortly.

### 2. Risk Management

- The new format operational risk register is live, and is the subject of further papers within this meeting. Updates to mitigations and residual risk are underway. Propagation of the new risk management model into the Projects area will take place over the next months.
- BDO's review of the new approach was largely positive and provides independent assurance on its suitability.

### 3. Business continuity

- A minor basement flood occurred over the weekend of 24-25<sup>th</sup> July. The cause appears to have been overwhelmed drainage following a burst watermain upstream. The majority of costs associated with this are covered by insurance. This is treated as a minor test of our business continuity effort
- Minor testing of the ShadowPlanner Business Continuity app with new members of ELT has taken place in preparation for a larger test later in the year.

#### 4. Near Miss Reports (NMR) summary

- The NMR process is being updated and will be called Serious Incident Reports (SIR). There have been no new incidents declared since the last ARAC meeting in June.

#### 5. Health and Safety

- No reportable incidents have been recorded since the last ARAC meeting in June.

#### 6. Other compliance

- No employee whistleblowing disclosures, or incidences of fraud or bribery have been recorded in the reporting period.

#### 7. Single Supplier sign off procurement (July/August 2021)

Department procuring	Service procured	Reason for single source supplier
Education Department	Delivery of collated Higher Education Statistics Agency (HESA) data	A single organisation holds this information (HESA), who contract data consultancy to a single organisation (Jisc)
Human Resources Department	Coaching, management and leadership consultancy and services	Uniqueness of items or services to be procured from the proposed contractor -WDI consulting is a consultancy that specializes in offering tailored consultancy to support inclusive and women's leadership.

## C. Information Governance

Data is provided below of the rolling year's information governance activity. The HCPC has for some time reported and risk assessed personal data incidents. Reporting period and annual figures are set out below. Incidents that meet the Information Commissioners (ICO) criteria for reporting are notified to the ICO.

	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21
FOI	21	14	14	18	8	8	16	27	15	14	22	16	18
SAR	2	11	9	10	10	8	10	12	12	11	13	15	11
Disclosure requests	8	4	4	5	1	6	6	4	3	6	3	4	2
Internal reviews	1	2	3	3	0	1	1	2	1	6	3	1	3
ICO	0	0	0	0	0	2	0	1	0	0	1	2	2
Total requests received	<b>32</b>	<b>31</b>	<b>30</b>	<b>36</b>	<b>19</b>	<b>25</b>	<b>33</b>	<b>46</b>	<b>31</b>	<b>37</b>	<b>42</b>	<b>38</b>	<b>36</b>
Total closed	30	23	36	30	26	21	23	41	42	30	35	38	45
Response within statutory timescale	30	22	33	30	26	17	22	37	35	28	27	35	42
Response in breach of statutory timescale	0	1	3	0	0	4	1	4	7	2	8	3	3
% within statutory timescale	<b>100%</b>	<b>96%</b>	<b>92%</b>	<b>100%</b>	<b>100%</b>	<b>81%</b>	<b>96%</b>	<b>90%</b>	<b>83%</b>	<b>93%</b>	<b>77%</b>	<b>92%</b>	<b>93%</b>
<b>Data incidents</b>													
No. of data incidents	1	8	3	3	1	2	0	4	4	5	5	2	4
No. reported to the ICO	0	0	0	0	1	0	0	0	0	0	0	0	0

## D. Feedback and Complaints

The annual feedback and complaints report will be discussed later in this meeting. Numbers of complaints have increased in August and are still being logged.

Number of complaints received in 2017, 2018, 2019, 2020 and 2021

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Total number	Monthly average	Comps per 1000 (yearly)
2017	39	28	46	33	40	32	32	34	40	37	32	24	417	35	1.16
2018	31	29	28	20	48	24	29	32	40	30	47	43	401	33	1.10
2019	49	44	45	48	62	35	38	39	42	72	79	36	589	50	N/A
2020	43	44	30	26	23	29	35	25	44	34	38	34	405	34	
2021	56	38	66	57	45	78	50							56	