Audit and Risk Assurance Committee
13 November 2024

hcpc health & care professions council

Strategic Risk Register – November 2024

Executive Summary

The presented report sets out the HCPC's strategic risks as of November 2024.

The risk register details:

- strategic risk 1 has been updated following a review held with ELT to better reflect the risks that the HCPC face;
- the risk score including the target score the executive is working towards;
- a description of how the risk relates to the HCPC's risk appetite;
- current mitigations in place;
- progress on workplans, and how they mitigate the risk; and
- a commentary box outlines the changes to the risk since the last iteration (August 2024).

Previous consideration	The Committee reviews the strategic risk register at each meeting.
Decision	• The Committee is invited to question and provide feedback on the content of the register. • The Committee is asked to agree the theme for discussion of the strategic risk register in March 2025.
Next steps	The Committee will receive the next report at their meeting in March 2025.A full strategic risk register review will take place in 2025-26.
Strategic priority	The strategic risks are relevant to all aspects of the Corporate Strategy 2021-26.
Financial and resource implications	None
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HCPC Strategic Risks
Summary of strategic risks

Strategy	Strategic Risks - to September 2020	Strategic Risks - from November 2020	Risk Description	Aug-24	Target Risk*
1 - Continuously improve and innovate - to improve our performance against PSA standards of good regulation and to innovate across all our regulatory functions to provide an enhanced user experience.	1. Our regulatory performance does not meet the expectations of our stakeholders and as a result stakeholders have negative experiences of our regulation	1. We are unable to deliver our regulatory requirements effectively in a changing landscape, effecting our ability to protect the public.	Not delivering or meeting: Informed registration decision making; Proportionate and fair FTP decision making; Engaged Education decision making; PSA Standards of Good Regulation; Appropriately managed improvement programmes in regulatory areas; Consideration of EDI needs, including accessibility of functions and fairness of decision making.	9	6
2 - Promote high quality professional practice - enable our professions to meet our standards so they are able to adapt to changes in health and care practice delivery, preventing harm to service users.	2. The HCPC's regulatory expectations are not appropriate or not understood by registrants and other stakeholders	2. Our standards do not reflect current practice and/or they are not understood by registrants and our stakeholders.	Relates to: Quality and suitability of our standards and guidance in setting a threshold for safe & effective practice which protects the public. How effectively we communicate our regulatory expectations. The effectiveness of our professionalism and upstream regulation work. Effective and informed consultation process, including enhanced EDI consideration.	3	3
3 - Develop insight and exert influence - learning from data and research to inform our decision making and share insights to protect, promote and maintain the health, safety and well-being of the public.	3. We are unable to harness the benefits of the wealth of data we hold	3.a Quality of our data leads to assumptions or gaps in understanding, and therefore inadequate or uninformed decision making. 3.b We are unable to maximise our use of the data we hold to share insights to protect, promote and maintain the health, safety and well-being of the public.	This includes our effectiveness in collecting, maintaining, and utilising the data we need to be an intelligence driven regulator and the effectiveness of our insight and intelligence work. It relies heavily on the work of the digital transformation and IT team and includes operational reporting in the Corporate Services team. It also relies on regulatory teams inputting information.	12	6
4 - be visible, engaged and informed - we regulate, take and communicate decisions which are informed by a deep understanding of the environment within which our registrants, employers and education providers operate.	4. We do not understand our stakeholders needs and so are unable to be as effective a regulator as we can be	4. We are unable to effectively build trust, engage with and influence our stakeholders reducing our ability to understand their perspectives and regulate effectively.	This includes how effectively we engage with our stakeholders and our credibility with them and how well we play our part in the wider system. It includes our EDI practice externally, the ability to respond and influence external drivers for change.	9	6
5 - build a resilient, healthy, capable and sustainable organisation - Employees feel valued and supported, and fully able to contribute. The organisation is resilient and able to quickly adapt to changes in the external environment.	5. The resources we require to achieve our strategy are not in place or are not sustainable.	5.a The resources we require to achieve our strategy are not in place or are not sustainable. 5.b Our organisational values are not reflected at all levels of the organisation, leading to staff not feeling supported/trusted/listened too.	This risk includes not securing the resources we need to be effective and/or not being efficient and effective in our use of our resources (resources include financial, knowledge, skills, culture, infrastructure). The development of our culture, people and physical assets, our continued financial viability and the significant failure of key business processes.	12	9
6 - promoting the value of regulation - The public, registrants, students and employers understand the value and importance of regulated health and care professionals.	6. The HCPC is unable to realise the benefits of regulatory reform, or these benefits are significantly delayed	6. We do not sufficiently or appropriately promote our work leading to opportunities to enhance our regulatory activity being missed and the benefits of regulatory reform remaining unrealised. This can manifest in two primary ways: a) the role of regulation in the delivery of high-quality care is underestimated by the public, registrants, students and employers. b) our ability to protect the public is under-recognised by policy makers and influential stakeholders.	This risk includes the HCPC's capacity and capability to engage and influence regulatory reform effectively to ensure its benefits are realised, as well as the HCPC being viewed by government as a priority regulator for reform.	8	6

Old	Mitigation key	New
	Preventative	🚫
	Monitoring	👁
	Detective	🔦
	Remedial	🚑
	Horizon scanning	🎣
	Best practice development	🏆
	Communication	📢

Heat map of strategic risks - residual

Heat map of strategic risks - target
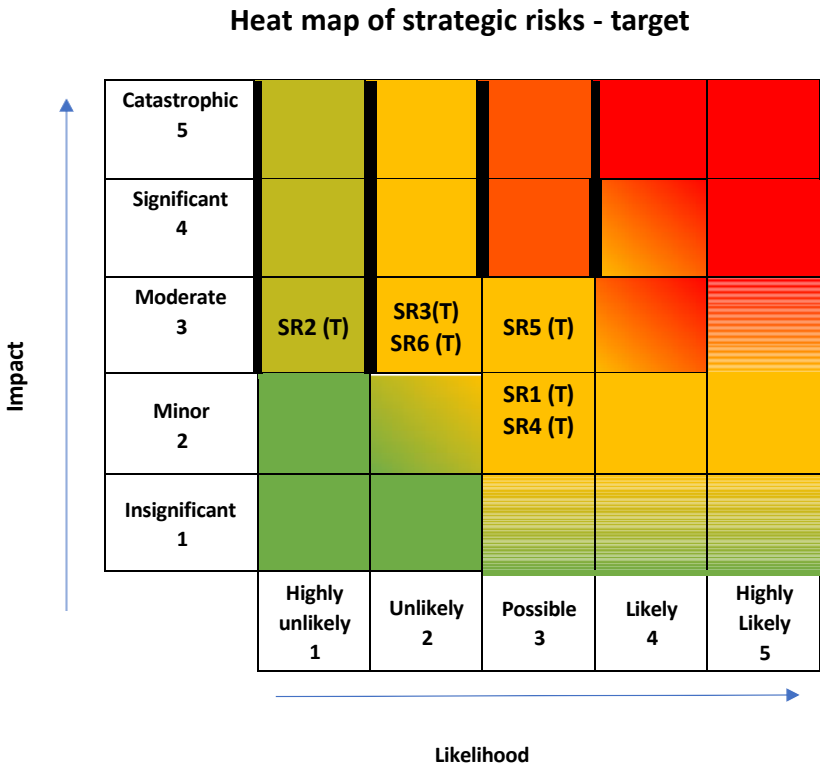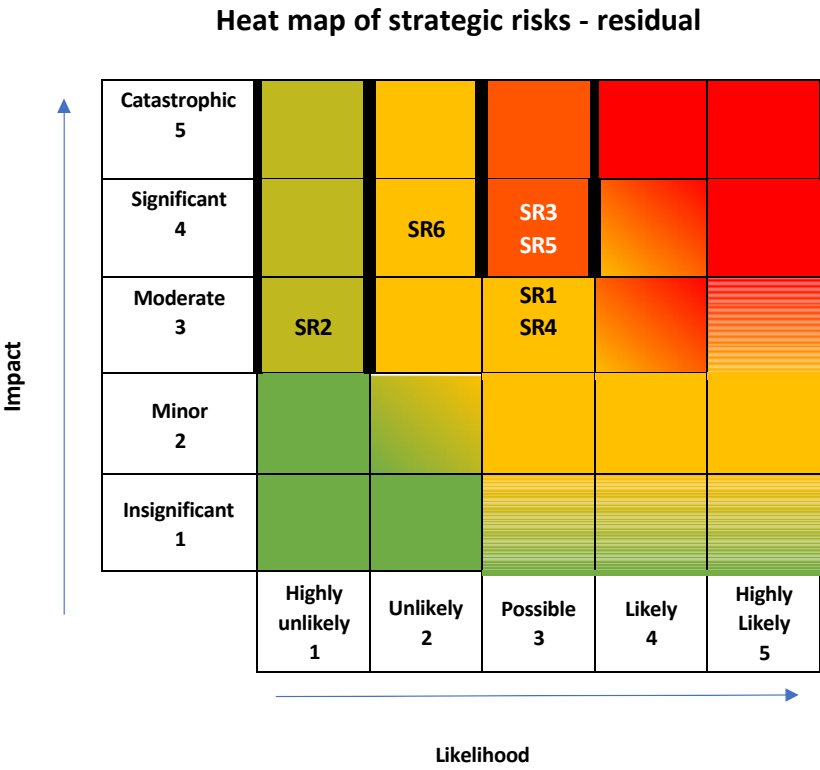
Strategic Risk 1. We are unable to deliver our regulatory requirements effectively in a changing landscape, effecting our ability to protect the public.

Date	Risk Owner
Nov-24	Executive Director of Education, Registration and Regulatory Standards

Risk Summary

Not delivering or meeting:
Informed registration decision making; Proportionate and fair FTP decision making; Engaged Education decision making; Professional Standards Authority (PSA) standards of good regulation; appropriately managed improvement programmes in regulatory areas; consideration of EDI needs, including accessibility of functions and fairness of decision making.

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	3	x	3	9
Target risk	2	x	3	6

← No Change

Current Risk Influencers

- − The 2023-24 PSA performance report published August 2024 shows we met 16 of 18 standards.
- − Engaging with regulatory reform programme and are next on the list to go through the process.
- − Online applications project delivered online Int and UK applications. This has increased reg advisor processing productivity significantly.
- − The Education team are through the backlog now, and about six months ahead of where the team were this time last year. The team is now focusing on case planning which will ensure greater compliance with KPIs and service levels
- − The second tranche of fitness to practise (FTP) improvement projects are in delivery, continued focus on embedding of tranche 1 benefits.
- + Wider tone of voice work to be scoped in order prioritise for the next phase of the project
- + Teams will require additional resource to engage in regulatory reform preparation when commences for the HCPC.
- + Restrictions of the current legislation is that we're not able to respond quickly to developments, constraining us in some areas.

Risk Appetite

Regulation = Measured; Influence and Leadership = Seeks

The risk appetite target level within tolerance if below red/amber. We are confident that our standards and guidance are fit for purpose and so this risk is currently within risk appetite.
To maintain that control onward reviews are essential to ensure standards are constantly kept under review to maintain relevance to changing practice and the wider health sector.

Current risk level is within risk appetite

Mitigations in place

- Second line quality assurance (QA) plan for 2024-25 to review success of improvements in FTP, registration and education in addition to first line QA activity in place, such as the FTP DRG and panel member feedback following each hearing.
- FTP improvement programme and governance in place, FTP improvement oversight board regularly meeting with attendance of the PSA and the Department of Health and Social Care (DHSC). Regular self-assessment against PSA standards reported to the Council.
- Modern education QA model. Regular feedback sought and acted upon to improve process application and stakeholder experience. Education provider self-service portal in place improving experience of education.
- Centralised PSA coordination. Participation in inter-regulatory working groups to share good practice and discuss common issues, this is also provided through the use of a panel of legal providers for FTP matters.
- Monitoring regulatory performance through performance reporting and KPIs.

- Mature feedback and complaints service in place focused on extracting learning when things go wrong.
- Online application capability in place for UK and international applications.
- Regular learning and development for partners and employees.
- Registrant health and wellbeing strategy, registrant support line in place.
- Wide range guidance on the HCPC's regulatory processes available on our website.

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
Strengthen our user experience	AI automation for contact centre has already seen improvements in quality and consistency of responses. An annual licence has been purchased and work will be starting to identify other mailboxes access the business, starting with policy. Initial investigation undertaken on opportunities to automate other parts of the registration process (Edu pass list verification, identity checks) Tone of voice review in registration on track for Q4.	By delivering these workplans we will support the expectations of our stakeholders more effectively, ensuring a positive experience.	The PSA performance report for 2023-24 was published on 30 August 2024. This showed that we met 16 out of 18 standards, including meeting standard 18 (FTP support/comms) for the first time. We continue not to meet standard 15 (FTP process/timeliness) and have not met standard 17 (FTP risk) after meeting last year. The risk score remains the same due to this - while we lost a standard we met last year, this was due to a single case and we have gained a new standard.
Partners transformation work	Project initiated and plan presented to board. Initial focus on payment system, pathways and responding to the Sommerville case. Finalised partner service agreements. Partner payment pathways design workshops and gap analysis undertaken with regulatory functions. Requirements for payroll identified. KPIs and quality assurance to start in Q4.	Updating our approach to our Partner stakeholder operating model.	
Education	Scope of Higher Education Statistics Agency data added for review to the data platform work, however not yet confirmed if this will deliver the milestone as defined.	Reducing burden on education providers, and collaborating closely, will help provide a better experience.	
FtP improvements/ developments	Ftp operating model on track for Q4, including frontloading. Scoping discussions commenced to inform review of sanctions policy. Review of operational processes for hearings and scheduling in progress, outputs may drive system changes. On track for Q4.	The new FTP operating model, including frontloading, will allow us to provide more timely decisions for the most serious cases.	

Strategic risk 2. Our standards do not reflect current practice and/or they are not understood by registrants and our stakeholders.

Risk Summary

Relates to:
Quality and suitability of our standards and guidance in setting a threshold for safe and effective practice which protects the public; how effectively we communicate our regulatory expectations; the effectiveness of our professionalism and upstream regulation work; effective and informed consultation process, including enhanced EDI consideration.

Date	Risk Owner
Nov-24	Executive Director of Education, Registration and Regulatory Standards

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	3	x	1	3
Target risk	3	x	1	3

← No change

Current Risk Influencers

- − Four country resource in place in PUR better enabling UK wide prevention engagement.
- − Education team now has a national model with relationship managers in place for each provider
- − Partnership working with NHS England on preceptorship principles (supporting new professionals transition to workplace) approved by Council and published. Implementation guidance published in November 2023.
- − Revised Standards of conduct, performance and ethics (SCPEs) and guidance on social media live September 2024. Easy read guide for
- − SCPEs has been produces, aimed at the public. #myHCPCstandards 2024-25 events programme has commenced aiming raising awareness
- + of standards requirements.
- + Changes to SCPEs may pose risk to registrant understanding of expectations following implementation. Plan under active monitoring to mitigate.

Risk Appetite

Regulation = Measured; Influence and Leadership = Seeks

Current risk level has reduced from 6 to 3, and therefore is within risk appetite.

To maintain that control onward reviews are essential to ensure standards are constantly kept under review to maintain relevance to changing practice and the wider health sector.

Current risk level is within risk appetite

Mitigations in place

- Public consultation process in place, including equality impact assessments (EIAs) to capture the EDI element.
- Engagement with key stakeholders/experts for widescale profession specific changes to standards, including the EDI forum.
- Guidance provided on meeting our standards, #mystandards webinar series.
- Dedicated website hubs for registrants, students, employers, members of the public, education providers.
- Policy enquiries function available to support understanding and application of our standards.
- Regulatory approach to advanced practice defined and agreed by the Council.
- Professionalism Liaison service in place influencing employers, using knowledge to effect change through engagement and advice.
- Policy and Communication teams at full complement. Head of Communications in place

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
SCPEs implementation and SETs review	SCPEs came into effect on 1 September 2024. Implementation work completed via several internal and external workshops to inform registrants, professional bodies, education providers and colleagues of the revisions to the standards. Commenced review of SETs: Status report to the Education and Training Committee (ETC) in November 2024, in formulating proposals phase now.	Communication and guidance plans built into our standards reviews.	SCPE's successfully came into effect on 1 Sept. There has otherwise been little change since the last risk report. The risk remains the same.
English Language	Results from public consultation published (7 June 2024). Implementation of new requirements is planned for Jan 2025, work underway with Business Change and Head of Regulatory Development. Progress update presented to the ETC (September 2024). NEW: Develop new guidelines for advanced practice, secured funding from NHS England, programme of work taking forward, recruiting some resource as well.	The new English language requirements will bring us in line with other regulators - broadly consulted on	

Strategic risk 3.a Quality of our data leads to assumptions or gaps in understanding, and therefore inadequate or uninformed decision making. 3.b We are unable to maximise our use of the data we hold to share insights to protect, promote and maintain the health, safety and well-being of the public.		Date	Risk Owner
		Nov-24	Executive Director of Education, Registration and Regulatory Standards

Risk Summary: This includes our effectiveness in collecting, maintaining, and utilising the data we need to be an intelligence driven regulator and the effectiveness of our insight and intelligence work. It relies heavily on the work of the digital transformation and IT team and includes operational reporting in the Corporate Services team. It also relies on regulatory teams inputting information.

	Impact		Likelihood	Risk Score
Inherent risk	5	x	4	20
Current Risk	4	x	3	12
Target risk	3	x	2	6

← No Change

Current Risk Influencers

- − Priority is to improve data quality before moving to next maturity level.
- − Findings of analysis of the attrition rates of the 15 professions published, contributing to wider workforce planning aims. Positive reception from stakeholders.
- − IT team delivered successful first modules of new data platform, supporting EDI reporting, meeting the needs of the Health Education England (HEE) data sharing project and improving access to core registration data.
- − % of registrant EDI data held has improved with 95% of those renewing opting to provide data. System improvements delivered to make data collection mandatory as part of online registration processes.
- − Data Engineer in place, data standards officer on secondment. A data migration specialist has been recruited on a temporary basis to support the Business Central project.
- − Automation of council reporting completed
- + Ongoing risk of short term appointment of data manager, data consistency, accuracy and completeness will continue to be a concern.
- + Quality and completeness of underlying data causing delays to analysis as significant cleansing work required. Information and Analytics team working with Ops teams to resolve and mitigate against continued imputing of new bad quality data.

Risk Appetite

Data = Open

Therefore, our appetite for this risk is to be within the amber scale rather than a higher appetite.

To reach our target we need to have the data platform in place to enable an analytics environment. We will require assurance on the quality of and approach to our data and reporting, including clear definitions.

Current risk level is outside risk appetite

Mitigations in place

- Publication of FTP, education and registration information and datasets through annual reports and freedom of information (FOI) requests.
- Insights and Intelligence framework agreed, setting out priorities and approach for data analysis.
- Dedicated resource for Analysis and Intelligence and Data Engineer in place.
- Publication of in-house statistical analysis of EDI data and register attrition rates published.
- Oversight board for programme for data excellence in place.
- Renewals data dashboard accepted report now in place agreeing renewals counts of actuals and previous windows.

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
Research	Discussions held with Turing institute and with Chair of Council, Turing may have capacity to work with us next year on the interaction between the increasing use of artificial intelligence (AI) by healthcare professionals and professional regulation. This will move to next year's plan, released some capacity to work on professional boundaries. Scoping is finalised on research to explore professional boundaries with a focus on sexual misconduct, and will continue into next year.	Developing an organisational research strategy to utilise our data more effectively	We are using our data more effectively and actively. The Registration MDS systems work is in delivery. However there is still work to be done to cleanse the data, and to insure accountability.

Risk score has not changed |
| **Continuing to improve data quality/infrastructure** | Minimum data set for FTP in development, we are bringing in a data manager to support this work and develop common data dictionary. Plans drawn up to continue the data platform build to implement this model, alongside undertaking design and build work for Registration data. Data manager will help to identify these. | Establishing minimum data set (MDS) to support better use and consistency of data | |
| **Insights and Analytics** | Analysis of FTP case outcomes by diversity characteristics will be included and published in Q3. Proof of concept work now underway to establish the best technical approach to internal and external self-service reporting, alongside establishing what datasets the organisation wishes to make available in this way. Established with IT can publish a power BI on website, diversity factsheets being finalised now. Data sharing initiatives commenced via sharing of data with the Chartered Society of Physiotherapy which was subject to data sharing agreement. Trialling application programming interface (API) management solution to make data sharing initiatives easier and safer. | Using the data available to us to understand our registrants, and share this data with our stakeholders | |

Strategic risk 4. We are unable to effectively build trust, engage with and influence our stakeholders reducing our ability to understand their perspectives and regulate effectively.

Date	Risk Owner
Nov-24	Executive Director of Education, Registration and Regulatory Standards

Risk Summary

This includes how effectively we engage with our stakeholders and our credibility with them and how well we play our part in the wider system. It includes our EDI practice externally, the ability to respond and influence external drivers for change.

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	3	x	3	9
Target risk	3	x	2	6

← No Change

Current Risk Influencers

- − Professional liaison consultants in place in each of the 4 UK countries, improving our reach for engagement work.
- − Collaboration with NHS employers to reach out to attendees of joining the UK workforce upstream events, contributing to the wider workforce agenda. Also, in this area we published our analysis of register retention improving understanding of attrition, preceptorship principles published and preparedness for practice research launched.
- − Education team now has a national model with relationship managers in place for each provider
- − Strategic Relationship Lead in place and actively managing and supporting relationship managers' network. Relationship management model reviewed and revised in quarter 1. Engagement management group established to support more targeted forward planning for engagement.
- **+** Single CRM forms part of the tech roadmap agreed by the Council and we will be progressing an investment case for the early stages of this work as part of the 2025-26 investment round.

Risk Appetite

Influence and Leadership = Seeks

We have built a strong engagement plan with our stakeholders, particularly building a more positive and transparent relationship with the Professional Bodies Forum.
In order to meet target, this risk is also dependent on being able to deliver stakeholder expectations such as more automated processes.

Current risk level is within risk appetite

Mitigations in place

- ELT relationship building and liaison with key stakeholders particularly Government Departments, professional bodies, other regulators, unions.
- Personal engagement plans for Chair andChief Executive in place. Engagement management group meets regularly to monitor and plan engagement strategically. Operational level relationship manager engagement for key stakeholders in
- Communications and strategic engagement supported by external communication partner.
- Horizon scanning and intelligence gathering including from relationship building to be aware of external drivers and influencers, early planning, and scenario development.
- EDI strategy and action plan informed by independent audit of EDI practice. EDI Stakeholder Forum and internal EDI Employee Forum.

- Policy statement on approach to MOUs in place, a number of MOUs agreed with key stakeholders.
- Analysis and action planning from feedback mechanisms including corporate complaints, FTP stakeholder surveys, stakeholder opinion polling and education provider survey.
- Professional body forum in place, including regular meetings both virtually and in person.
- Office of Chair and Chief Executive established
- Public consultation process in place, including EIAs to capture the EDI element.

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
HCPC Service User Strategy	Contract with the Patients Association agreed for one year, will have core element of engagement strategy included. Longer term plan underway, currently defining responsibilities	Ensuring service user engagement in development of policy/strategy	We have continued to deliver a programme of active engagement with our stakeholders, and also continue to strive to improve our engagement and impact. The online concerns project has been delayed to QA, but will still be delivered this financial year.

The risk score has not changed. |
Equality, Diversity and Inclusion	Collection of EDI data of FTP complainants at point of raising a concern is dependent on online concerns portal go live. Delivery of the online concerns portal is expected in Q4Scoping commenced for development of an evidence-based framework for assessment of education provider performance against our education standards linked to EDI. Engagement with EDI forum, October forum will see something to inform this work. Scoping commenced for development of an evidence-based framework for assessment of education provider performance against our education standards linked to EDI.	Gathering further EDI information in order to identify any bias or unintended consequences in our decision making process.	
Stakeholder engagement	Forward programme progressing, Chief Executive visits for 2024-25 to healthcare provider sites have included Glasgow (June 2024), Belfast (September 2024). The Chair of Council presented to the Association of Perioperative Practice annual conference (2 August 2024). Further events are in the pipeline. Evaluation planned with stakeholder feedback, good current trends/evidence. Finalising a survey now working with Head of Information and Analytics.	Active engagement by CEO and Chair with stakeholders. Measuring the impact of our engagement will support continuous improvement.	
Council Apprentice	Received a positive response around establishing the network, a meeting will be scheduled imminently with opportunity for heads of service colleagues to join to update periodically on HCPC areas of interest. Engaging with the General Medical Council (GMC) who are looking at setting up their version so sharing some learning from the HCPC scheme. Also engaging with	Ensuring more diverse voices on council informing decisions.	

Strategic risk 5.a The resources we require to achieve our strategy are not in place or are not sustainable.
5.b Our organisational values are not reflected at all levels of the organisation, leading to staff not feeling supported/trusted/listened too.

Date	Risk Owner
Nov-24	Executive Director of Resources

Risk Summary

This risk includes not securing the resources we need to be effective and/or not being efficient and effective in our use of our resources (resources include financial, knowledge, skills, culture, infrastructure).

The development of our culture, people and physical assets, our continued financial viability and the significant failure of key business processes.

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	4	x	3	12
Target risk	3	x	3	9

← None

Current Risk Influencers

- − Budget factors in projected future benefits of investments, to be validated at project initial phase and tracked to ensure deliver.
- − 2023-24 balanced budget achieved. Draft 2024-25 balanced budget, medium term financial plan.
- − November 2023 fee rise implemented. Regular, incremental fee reviews required to maintain HCPC financial sustainability, including in light of increased costs from FTP volumes, need for continued investment and financial risks.
- − People strategy in place: BDO audit shows good progress. Performance against KPIs good - sickness absence and turnover reducing. Annual personal development review (APDR) participation for 2023-24 was 100%. New programme for aspiring managers launched in October 2024.
- − Business Central finance system live from April 2024, improving financial control and reporting. Phase 2 in progress.
- − Carbon baseline for the HCPC now established with action plan for improving sustainability being developed with expert input and involvement of ELT and senior leadership group.
- − Publication of gender and ethnicity pay gap reports.
- − Change and Benefits Forum established, reporting to ELT to strengthen change management and ensure delivery of benefits.
- − Restructure of ELT live from 1 November 2023, with maternity cover appropriately planned to mitigate gap.
- + Legal position on partners' employment status determined, following judgement in Nursing and Midwifery Council (NMC) employment tribunal case. Project initiated to manage the different streams of work including contracts, payments, and quality statements.
- + Rising inflation increases HCPC costs and HCPC employees cost of living pressures; impacts mitigated by budgeting, pay review and efficiency plans as part of benefits realisation.

Risk Appetite

Financial = Measured; People = Open

Current risk is outside risk appetite, with the benefits of the introduction of increased fees in November 2023 and a positive People Strategy internal audit report partially offset by continued financial pressures and long term risks. To meet our target risk we need regular fee reviews to maintain financial sustainability, in addition to maintaining the rate of progress in other areas. The target also requires our financial reserves to be stronger.

Current risk level is outside risk appetite

Mitigations in place

- Adherence to budgeting and financial management and reporting processes which are subject to internal and external audit e.g. National Audit Office (NAO). Finance business partner challenge and budget setting principles agreed by ELT.
- Business change function provides challenge on benefits outcomes of investment in new areas of work or enhancements to existing processes. Medium term financial strategy in place incorporating an efficiency action plan.
- All employees are set goals and objectives and undertake annual performance review which includes an assessment against our values (Fair, Compassionate, Inclusive, Enterprising) promoted through all employee performance system
- HR includes a central learning and development function for employees, which runs an annual learning and development plan for commonly identified skill and knowledge needs in addition to annual compliance training in areas
- Employee Forum acts as a consultation group for organisational change.

- Adherence to HR processes in relation to recruitment, annual performance development review and learning and development for employees. All HR policies have been updated in the last 12 months
- Adherence to partner processes in relation to recruitment, onboarding and Partner Code of Conduct (updated Jan 2024)
- Effective IT system design maintaining confidentiality, integrity and availability of data. Digital transformation strategy provides roadmap for improving our IT systems.
- Maintenance of ISO27001 Information Security standard which is subject to external audit / Regular independent security assessments of key IT infrastructure. Maintenance of business continuity infrastructure
- ELT monthly monitoring of productivity of all departments through detailed performance reporting. KPIs reported to Committees and the Council for oversight of performance and progress in meeting agreed milestones

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
Update HCPC Fee model	Framework for regular fee reviews complete with Council approval. Consultation on fee rise completed and Council considering consultation finding and making decision on fee rise at September 2024 meeting.	A new fee model allows is needed in order be sustainable and achieve our strategy	The fees consultation closed on 14 June 2024, proposing an increase of the registration fees by £6.98. A total of 1,040 responses to the consultation were received, all feedback is being reviewed and will be taken into account by Council when making a decision. On 9 July the NMC published and independent culture review which showed damning evidence effort the culture that employees were working within. Following the publication of this report the HCPC reviewed how we are assured on our own culture to identify any gaps or opportunities for improvement. The CEO also took quick action to actively communicate with all of ELT, SLT and the wider organisation.

Risk score has not changed |
People strategy	Recruitment portal has enabled high numbers of applications (690 in Q1), other activity has included a career fair promoting roles across FTP and Registration departments. Launch of new learning and development programmes (September 2024) as planned. The monitoring of equality and diversity data is taking place with ELT/People and Resources Committee on a quarterly basis. Introducing a Speak Up Guardian role to support staff - Expressions of interests received, and next stage of recruitment underway.	The people strategy is in place to improve retention, recruitment, and culture	
Digital transformation	Work underway alongside Business Change on investment phase of modern data platform, aiming for Q4. May slip into Q1 or Q2 next financial year. Technology roadmap signed off by the Council, key technology partnerships being developed and PRC/Council engaged. User experience improvement is on track and pilot successfully completed on uses of AI in registration.	Modernising our data platform and approach is needed to ensure we are sustainable and effective	
IT security modernisation	Work continuing roll out of E5 with investment case being developed for next phase. On track for Q4. New: Design and deploy ALP and DLP solution for data loss prevention and document security. Investment case approved by ELT on 17 September 2024.	Modernising our IT security is needed to ensure sustainability	
Environmental Sustainability	Evaluation criteria for procurement processes have been developed and now being implemented. An early-stage version of an environmental monitoring solution (EMS) is in place, reporting on direct emissions but not indirect emissions (internal reporting). Ongoing work via Employee Forum to develop sustainability workstreams. Information for onsite operations and will continue to develop scope 3 over time (ongoing area to work on).	As a modern and conscientious organisation our environmental sustainability plan ensures we are in line with requirements.	
Business Central Phase 2	Invoice automation work on track as planned. Deferred income module pushed back to Q3-4, owing to capacity constraints. Approach now defined. Move to Q1 next year flagged. Contract management module pushed back to Q4, on track for Q4. KPI and dashboard reporting on track per plan – Q3/Q4	Delivery of phase two of business central is required to complete the modernisation of our financial systems	

Strategic risk 6. We do not sufficiently or appropriately promote our work leading to opportunities to enhance our regulatory activity being missed and the benefits of regulatory reform remaining unrealised. This can manifest in two primary ways:
a) the role of regulation in the delivery of high-quality care is underestimated by the public, registrants, students and employers.
b) our ability to protect the public is under-recognised by policy makers and influential stakeholders.

Date	Risk Owner
Nov-24	Executive Director of Education, Registration and Regulatory Standards

Risk Summary

This risk includes the HCPC's capacity and capability to engage and influence regulatory reform effectively to ensure its benefits are realised, as well as the HCPC being viewed by government as a priority regulator for reform.

	Impact		Likelihood	Risk Score
Inherent risk	4	x	5	20
Current Risk	4	x	2	8
Target risk	3	x	2	6

← No Change

Current Risk Influencers

- − In its response to its consultation on regulatory reform, DHSC has confirmed that the HCPC and NMC will be the priority regulators for reform following the GMC.
- − HCPC provided feedback on, and participated in cross regulatory round table discussions, regarding the development of the GMC section 60 order. The HCPC has responded to this consultation.
- − Government leadership changes, and challenges in the health landscape could impact on the progression of regulatory reform due to other priorities.
- − Collaboration with stakeholders such as NHS England provides organisational experience for greater cross organisational collaboration on workforce as aimed for in regulatory reform. Positive and wide-reaching engagement with HCPC stakeholders on regulatory reform.
- − The HCPC has engaged with DHSC on how the recommendations of KPMG on the future regulatory landscape may be taken forward. DHSC has indicated that this will not be progressed as a priority, with the section 60 taking priority.
- + Funding needed to progress regulatory reform internally not included in 2023-24 budget and will be funded by ringfencing any surplus in 2022-23 and contingency in 2023-24 budget.
- + HCPC funding challenges risk being unable to scale up to meet needs of regulatory reform due to parliamentary approval of fees and associated long process to achieve this.
- + Regulatory reform not included in 2024-25 budget but will be reviewed once firmer dates are confirmed.
- + While the HCPC has now been named as the next regulator to undergo reform there is not clarity at this stage on the timescales for this. We expect this clarity once DHSC has run its consultation on the GMC legislation. Lack of timescale challenges planning and scaling up of resources within the HCPC dedicated to reform. Change of Government may have an effect.

Risk Appetite

Reform = Open

Current risk is within appetite.

The target risk will be reached if the outcome of regulatory reform and the longer-term regulatory landscape review compliments and endorses the multi profession regulation model. This requires successful HCPC engagement and effective messaging. Risk reduction also required greater clarity on timing of the HCPC's reform and confidence that funding and resources in place realise the opportunity of reform.

Current risk level is within risk appetite

Mitigations in place

Communications and strategic engagement, including parliamentarians and cross-party engagement, on regulatory reform supported by Luther Pendragon.

HCPC engagement on Health and Social Care Bill led to positive change.

Some dedicated policy resource in place.

Participation in cross regulator analysis of draft legislation and other regulatory themes, the HCPC's comments on draft legislation have been provided.

Funding and resource required for progression of regulatory reform quantified within budget as a financial risk. Assessment of de-prioritisation of other development work undertaken to create capacity for regulatory

HCPC medium term financial plan in place to seek to make provision for regulatory reform. Consultation expected to launch Sept 22.

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
Increase engagements with and influence of employers	Now delivered two 'insight for employers' webinars with further planned through the autumn and winter. Will be complete by end of Q3. Professionalism in practice programme to support registrants and employers to embed and achieve the standards on track as planned, the targets set may not be achieved this FY.	Increased engagements with wider stakeholders ensure understanding the value of our work, encouraging support for reg reform changes	Monthly meetings with DHSC still ongoing and regular catch ups with GMC and NMC. Scoping meeting with DHSC meeting with officials for lessons earned and requirements for the HCPC with a view to put together a timeline. We have had the opportunity to review both the GMC's rules and the NMC's planned rules.

The Professionalism and Upstream Regulation department continues to deliver a quality timetable of workshops to address the pressures facing our registrants.

Risk score has not changed. |
| **New registrants to UK practice** | Forward schedule of workshops planned to promote our preceptorship principles. Launch of new email (September 2024) for registrants (September 2024) (UK and international) to support registrants joining/returning the workforce (email now been launched). Workshop with employers on preceptorship held (September 2024). | Supporting registrants new to UK practice supports addressing the workforce crisis | |
| **Increase engagement with learners** | Three sessions delivered to students with further sessions in September 2024 of our "Becoming a health and care professional" programme. Programme updated to reflect the new standards. Work is being delivered but the scaling up will not happen this financial year.
Third student competition now closed with 15 entries - the highest number received. Now in shortlisting, result early November 2024, prize giving December 2024. | As above | |
| **Communication strategy** | Comms campaign for new standards completed with follow on comms to continue throughout the roll out phase to support with bringing new standards to life. Roll out of standard, rolling campaign continuing through Q3 and Q4. L aunch has happened, ongoing campaign continues.
Launch of new email in September for UK and international registrants to support registrants joining/returning the workforce. | As above | |
| **Education annual reporting** | Kicking off data gathering for state of nation report for the 2023-24 academic year. Paper to ELT, ETC November 2024 – findings from last academic year, plan out of this to produce information sheet linked with areas in our standards summarise our regulatory requirements and how providers have met them, common areas. Annual report each year with key findings. | As above | |

Webdings

Symbol	Char	Meaning
⃠	x	preventative
👁	N	monitoring
❗	m	detective
🚑	h	remedial
🚰	P	horizon scanning
🎖	&	best practice
📢	U	communication