

## Audit and Risk Assurance Committee

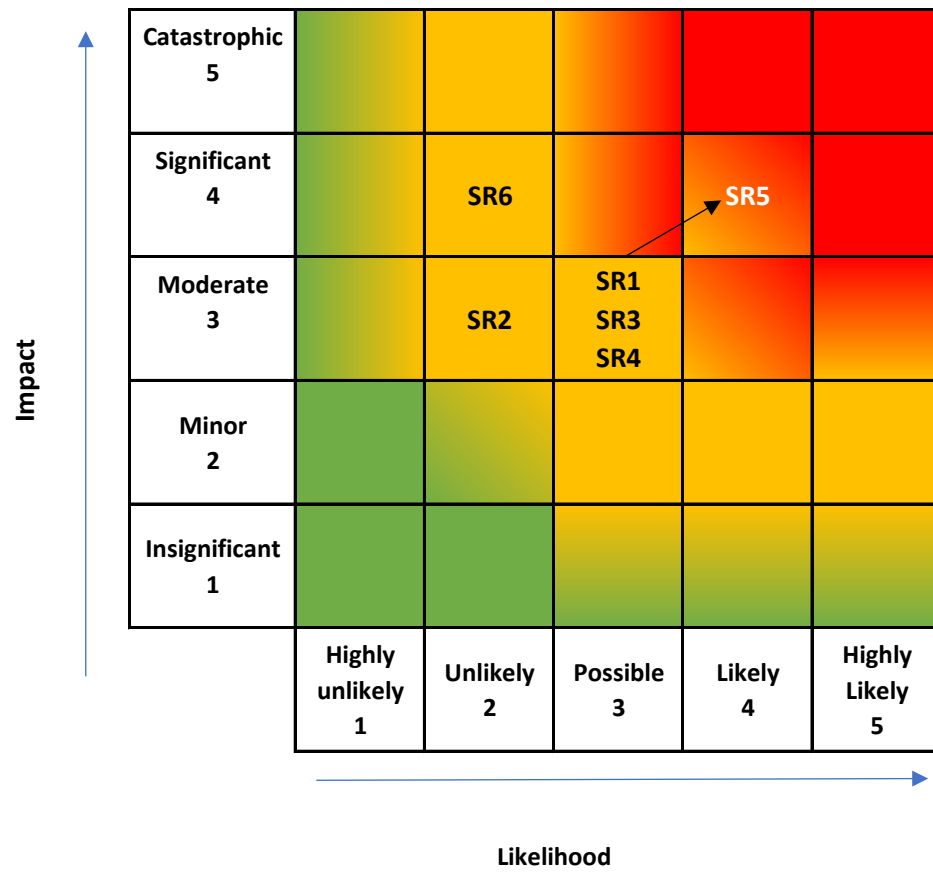
<b>Meeting Date</b>	20 November 2025
<b>Title</b>	Strategic Risk Register
<b>Author(s)</b>	Anna Raftery, Head of Assurance and Compliance
<b>Executive Sponsor</b>	Claire Amor, Executive Director of Corporate Affairs
<b>Executive Summary</b>	
<p>The presented report sets out the HCPC's strategic risks as of October 2025.</p> <p>The register details:</p> <ul style="list-style-type: none"> <li>• A description of how the risk relates to the HCPC's risk appetite;</li> <li>• current mitigations in place;</li> <li>• progress on workplans, and how they mitigate the risk; and</li> <li>• a commentary box outlines the changes to the risk since the last iteration (September 2025).</li> </ul> <p>Due to the continuing increase in fitness to practise (FTP) applications and legal costs, and the number of international registration application significantly decreasing, the impact and likelihood have both increased. This brings the risk score up to 16.</p>	
<b>Action required</b>	The Committee is asked to review the information provided and seek clarification on any areas.
<b>Previous consideration</b>	This is a standing item considered at each meeting of the Committee.
<b>Next steps</b>	Next report to Committee will be presented in March 2026 Full strategic risk register review will take place alongside corporate strategy review (Q4)
<b>Financial and resource implications</b>	None as a result of this paper.
<b>Associated strategic priority/priorities</b>	Continuously improve and innovate Build a resilient, healthy, capable and sustainable organisation

## Item 07

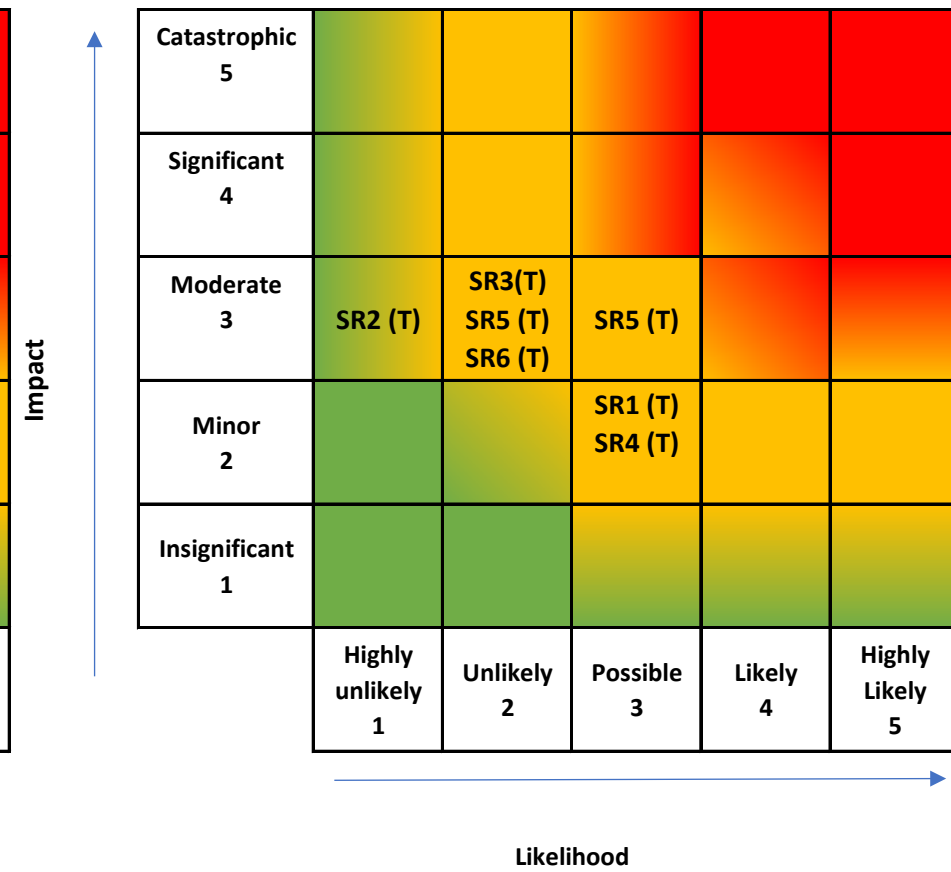
<b>Associated strategic risk(s)</b>	All
<b>Risk appetite</b>	All
<b>Communication and engagement</b>	None as a result of this paper.
<b>Equality, diversity and inclusion (EDI) impact and Welsh language standards</b>	This paper includes the assurance of HCPC EDI as related to regulatory and business practices.
<b>Other impact assessments</b>	This paper includes the assurance of HCPC data and sustainability as related to regulatory and business practices.
<b>Reason for consideration in the private session of the meeting (if applicable)</b>	Not applicable

HCPC Strategic Risks				
Summary of strategic risks				
Strategy	Strategic Risks - from November 2024	Risk Description	Nov-25	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. We are unable to deliver our regulatory requirements affectively 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. 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.	6	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.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.	9	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 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.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.	16	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. 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 due to: 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

Heat map of strategic risks - residual



Heat map of strategic risks - target



Risk score over time						
	SR 1	SR 2	SR 3	SR 4	SR 5	SR 6
Target	6	3	6	6	9	6
Nov-25	9	6	9	9	16	8
Sep-25	9	6	9	9	10.5	8
May-25	9	3	9	9	10.5	8
Feb-25	9	3	9	9	12	8
Nov-24	9	3	12	9	12	8

Strategic Risk 1. We are unable to deliver our regulatory requirements effectively in a changing landscape, effecting our ability to protect the public.	
<b>Risk Summary</b>	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.

Date	Risk Owner			
Oct-25	Executive Director of Education, Registration & Regulatory Standards			
	Executive Director of FTP & TS			
	Impact	Likelihood	Risk Score	
	Inherent risk	5	x	5
	Current Risk	3	x	3
	Target risk	2	x	3

No Change

Current Risk Influencers	
✓	The 2024-25 PSA performance report published June 2025 shows we met 17 of 18 standards.
✓	Engaging with regulatory reform programme, informed we are the priority regulator for reform. Section 60 priority is agreed with Council.
✓	Use of technology and AI to support delivery of regulatory functions.
✓	Decision to withdraw approval of an education programme
✗	NHS Manager barring scheme - Further clarity and planning needed to manage this new approach to regulation. Demonstrates the HCPC well thought of and high profile, but must be managed carefully
✗	Number of new FTP cases received increasing
✗	Tone of voice work still to be conducted in the wider organisation
✗	PSA is consulting on revised Standard of Good Regulation which will go live in 2026.
✗	High number of corporate complaints due to delays in the international application process, indication that this is reducing
✗	NHS 10 year plan in England changes models of care and therefor Education and training

Risk Appetite
Regulation = Measured; Influence & 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.
<b>Current risk level is within risk appetite</b>

Mitigations in place	
Second line QA plan for 2025-26 to review success of improvements in FtP, Registration & education in addition to first line QA activity in place, such as the FtP DRG and panel member feedback following each hearing.	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 with experience of how other
Wide range guidance on HCPC's regulatory processes available on our website.	Monitoring regulatory performance through performance reporting and KPIs.
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 stakeholders.	Use of AI powered plagiarism check for all international applications

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
<b>Registration Assessment model</b>	Rebalancing our reliance of documentary evidence, with implementation by end of financial year. Scoped investment in QA of test of competence as part of phase two.	A more balanced approach to international assessments will give more confidence in decision, and reduce delay complaints.	PSA: PSA will be auditing closed FTP cases as part of the 2025-26 performance review from 27 October.
<b>Customer contact</b>	<b>Complete</b> Commercial agreements to establish new strategic partner to delivery Customer Contact services for the HCPC (Q1) New strategic partner in place. The implementation of an as-is replacement of existing telephony system is on track. Feedback and Complaints improvement: Moved from Lotus notes to Excel which has allowed us to have more detail when recording the types of feedback and complaints received. Next stage to progress the reporting, which has been on hold to manage the BAU workload. New Feedback & Information officer starting in September.	More accessible and available communication through an improved customer contact services allows us to support people through their regulatory processes more effectively.	The partner transformation work continues at pace. The new contracts went live from the start of October, and new payment pathways are in place for FTP, Registration and Education. Next stage workshops will be held on 11 November for quality matrix and KPIs.
<b>Partners transformation work</b>	97.5% all partners signed new contracts for start of October. System and process improvements to regulatory function payment pathways completed for FTP, Education and Registration KPI and Quality: Analysis and workshops have been completed and verbal update given to PRC. Phase 2 workshops to be held in November.	A new model for how we approach and manage our partners will allow us to have more confidence in their performance.	On 23 October 2025 the HCPC Fitness to Practise annual report 2024-25 was published
<b>FTP Legal Services</b>	<b>FTP Legal:</b> Fraudulent entry investigations team established. Substantive order review team is now staffed with new ways of working. Internal Frontloading: Team established with a mix of cases and receiving regular allocations Professionalise our in-house legal services: On track for delivery as planned engaging with Business change and have a quote for research facilities obtaining quotes options for dictation and business change looking into current methods used elsewhere in business for electronic signatures. Delivery in Q4	FTP's continued improvement in performance, while also developing new approaches to delivering regulatory duties, ensures that FTP decision making is fair, proportionate, and of good quality.	
<b>FTP Case Progression and Quality</b>	FTP case progression: Operating model implemented (7 July), first cases streamed from July cases progressing to SDMs. With the number of cases increasing the department are looking how to continue to develop the streaming model further. The increased referrals is presenting a real challenge for casework allocation and progression. The team are managing and monitoring with close oversight, with risk prioritisation at triage.		
<b>Adjudication and Tribunal Services</b>	Tribunal Services: Listing and hearings of appeals of registration applications have moved to tribunal services. Ongoing work to improve efficiencies around our final hearing listing model. Registration Appeals management has transferred to tribunal services		

**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 & 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
Oct-25	Executive Director of Education, Registration & Regulatory Standards Executive Director of Corporate Affairs

	Impact		Likelihood	Risk Score	Change No
Inherent risk	5	x	5	25	
Current Risk	3	x	2	6	
Target risk	3	x	1	3	

**Current Risk Influencers**

✓	Thorough public consultation for all standards reviews, including proactive implementation guidance, workshops, and guidance to prepare registrants for any changes.
✗	Three country resource in place, recruitment for Scotland is underway, in for Professionalism and Upstream Regulation better enabling UK wide prevention engagement. Head of recruitment is ongoing.
✗	NHS 10 year plan in England changes models of care and ways of working that have to be considered in our standards and guidance for registrants
✗	Changing expectations of our professions' practice as a result of pressures on services, tech or societal events.

**Risk Appetite**

Regulation = Measured; Influence & Leadership = Seeks  
Current risk level has increased from 3 to 6, and therefore is outside 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 outside risk appetite**

**Mitigations in place**

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

Areas of Development	Progress 2024-25	Mitigation
<b>SETs review</b> ⓪	Council approved consultation for revised SETs, will launch in November and run for 13 weeks	Thorough consultation with a wide range of stakeholders gives us confidence our standards are proportionate and accessible
<b>Scope of practice</b> ⓪	Advanced practise webinars in collaboration with GOsC and NHS England: Webinars are running and we have received positive feedback and had good attendance. Next steps are to draft materials based on the webinars, Due to go to March ETC for an update	Supporting registrants and employers to understand scope of practice supports upstream regulation
<b>Professional Liaison Service</b> ⓪	Awaiting FTP report 24-25. Using external data points to target specific workplaces such as CQC reports, RQIA, NHS staff survey, external intelligence (FTP analysis framework) Recruitment for new of Head of Department is underway. Professional liaison consultant for Scotland recruitment will commence once they are in post. Delivering more in person sessions and using participants real life experiences in the sessions to explore the topics.	Utilising the source of stakeholder feedback received by the professional liaison service provides insight to registrants understanding of the standards.

**Reporting period commentary**  
AHP advanced practice webinars, developed in collaboration with GOsC and NHS England, ran from 29 October to 5 November. This included sessions tailored to both AHPs working at, or towards, advanced levels of practice as an AHP, as well as the managers and strategic leaders who support them.  
  
Due to the gaps in the Professional Liaison and Outreach department the risk likelihood has increased, bringing the overall risk rating to medium.

**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.**

**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.

Date	Risk Owner
Oct-25	Executive Director of Education, Registration & Regulatory Standards Executive Director of Resources




	Impact	Likelihood	Risk Score	
Inherent risk	5	x	4	<b>20</b>
Current Risk	3	x	3	<b>9</b>
Target risk	3	x	2	<b>6</b>

← Change No

Current Risk Influencers	
✓	Registrant datahub has been published, providing detailed insight into the population of our registrants.
✓	IT team delivered successful first modules of new data platform, supporting EDI reporting, meeting the needs of the HEE data sharing project and improving access to core registration data.
✓	Data manager in place to end of Q4 for data dictionary and quality processes. Data platform continues to develop - improving accessibility to date
✓	Automation of reporting data continues
✗	Ongoing risk of short term appointment of data manager means data consistency, accuracy and completeness will continue to be a concern. Permanent data governance lead role has been approved and will be recruited to start early 2026
✗	Quality and completeness of underlying data causing delays to analysis as significant cleansing work required. Data quality manager working with Ops teams to resolve and mitigate against continued imputing of new bad quality data.

Risk Appetite
Data = Open
Risk appetite is within tolerances with improved confidence of the quality of our data, and advancing of our reporting capabilities.
<b>Current risk level is within risk appetite</b>

Mitigations in place	
Publication of FtP, Education and Registration information and datasets through annual reports and FOI requests.	Interactive data hub launched 21 May 2024
Insights and Intelligence Framework agreed, setting out priorities and approach for data analysis.	Renewals data dashboard accepted report now in place agreeing renewals counts of actuals and previous windows.
Dedicated resource for Analysis and Intelligence and Data Engineer in place.	





Areas of Development	Progress 2025-26	Mitigation	Reporting period commentary
<b>Research</b> 	Commission research into the impact of the increasing use of AI by registrants working across our professions, settings and across the UK (Q3) Tender is drafted, working with procurement to define timeline	This research will give us insight on areas we should/could address as a regulator	On going improvements to self-service reporting tools, including retention rate dashboard being published at the end of August.
<b>Data quality and infrastructure</b> 	Data quality manager has developed new data governance infrastructure which has been approved and is in the process of being implemented. This includes a Information and Technology Governance Board and clearly defined data quality policies and processes	By continuing to improve the quality of our data and reporting capabilities we can be confident in the reporting we share	The research strategy is being developed in order to develop our thinking and approach to research going forward.
<b>Insights and Analytics</b> 	Continue to publish analyses of our data to provide insights to our stakeholders. This will include more detailed analyses of our FTP diversity data, further developing our data hub, enhancing our professional profiles dashboards and providing insights from registrants' CPD activity (Q3) On-track Collaborate and share our data across the sector in order to enhance public safety and professional practice. This will include exploring participation in a cross-regulator database, increased sharing of our data with professional bodies and further education data sharing and analysis (Q4) Ongoing Improve our external data reporting capability: workforce profiles (Q1) Completed, student/learner progression to HCPC registrant (Q3) and ongoing improvement to self-service reporting tools available on our website (Q2-4) Developing an FTP analysis framework (Q4) agreeing a way of counting phenomena in order to measure FTP data against these items CPD analysis is underway (Q3)	By sharing our data openly and providing more in depth analysis we are directly able to influence the health, safety and wellbeing of the public.	

**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.**

**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.

Current Risk Influencers	
✓	Collaboration with NHS employers to reach out to attendees of joining the UK workforce upstream events, contributing to the wider workforce agenda.
✓	Strategic Relationship Lead in place and actively managing and supporting relationship managers' network. Relationship management model in place. Engagement management group established to support more targeted forward planning for engagement.
✗	Three country resource in place, recruitment for Scotland is underway, in for Professionalism and Upstream Regulation better enabling UK wide prevention engagement. Head of recruitment is ongoing.

Mitigations in place	
ELT relationship building and liaison with key stakeholders particularly Government Departments, professional bodies, other regulators, unions.	Policy statement on approach to MOUs in place, a number of MOUs agreed with key stakeholders.
Personal engagement plans for Chair & Chief Executive in place. Engagement management group meets regularly to monitor and plan engagement. Operational level relationship manager engagement for key stakeholders in place across HCPC.	Professional body forum in place, including regular meetings both virtually and in person.
EDI strategy and action plan informed by independent audit of EDI practice. EDI stakeholder forum & internal EDI employee forum.	Public consultation process in place, including equality impact assessments (EIAs) to capture the EDI element.

Areas of Development	Progress 2024-25	Mitigation
<b>Developing the HCPC's next Corporate Strategy</b> 	Both internal and external survey completed. Workshops held with Prof bods, public, registrations, employees, edu providers (will be having one with patient association). Next steps: Phase 2: drawing together feedback and drafting the strategy	An informed approach to forming the new corporate strategy allows us to ensure our next strategy is robust and proportionate
<b>Equality, Diversity and Inclusion</b> 	Develop a network of EDI champions across the organisation to support driving forwards EDI commitments and enhance EDI resilience (Q2) Terms of reference have been drafted, and now ensuring alignment with the new EDI champion's network that HR have launched. Publish FTP report with further analysis of our EDI data (Q3) On-track Contribute to the development of the next Corporate Strategy to ensure EDI is embedded throughout (Q1-3) Ongoing	Continuing to show commitment to EDI through actions not only builds trust and credibility, but ensures our future strategy is appropriately informed.
<b>Stakeholder engagement</b> 	Build on a successful Chair/Chief Executive programme of relationship building and implement a refreshed stakeholder engagement plan that includes activity aligned to the HCPC's communication campaigns (Q3) Begin to establish a single customer relationship management (CRM) platform to allow better sharing of information and coordination of communication, engagement, quality assurance and complaint handling activity (Q4) Seek to amplify the voice of the service user in our work through targeted engagement with patient representative bodies such as the Patients Association (Q2)	Stakeholder engagement being accessible and informative helps us build relationships and understand their perspectives
<b>Strengthening our communication capabilities</b> 	Complete all phases of the resourcing and recruitment plan (Q4) Deliver SETs communication campaign (Q4) Working with IT and procurement colleagues, deliver an upgrade to our web platform to allow digital roadmap delivery (Q4) Phase one of brand refresh (discovery) done, phase two is concepts and underway(Q3)	As above

**Reporting period commentary**  
On 5 November members of the HCPC Council and Executive Leadership Team held an event at the Houses of Parliament in Westminster, to meet with a range of MPs, peers and officials.

Date	Risk Owner
Oct-25	Executive Director of Corporate Affairs Executive Director of Education, Registration & Regulatory Standards

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

Change: No

**Risk Appetite**  
Influence & Leadership = Seeks  
We have an 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**



**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.**

**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.

Date	Risk Owner
Sep-25	Executive Director of Resources

	Impact		Likelihood	Risk Score	
Inherent risk	5	x	5	25	← Increased
Current Risk	4	x	4	16	
Target risk	3	x	3	9	





Current Risk Influencers	
✓	Budget factors in projected future benefits of investments, to be validated at project initial phase and tracked to ensure deliver.
✓	We ended 2024-25 with a surplus budget and meeting our reserves policy of realisable net assets
✓	Latest fee rise in effect from 29 April 2025.
✓	People strategy in place: BDO audit shows good progress. Performance against KPIs good - sickness absence and turnover reducing. APDR participation for 2024-2025 was 100%.
✓	Two Speak Up Guardians in place from senior leadership. Annual report due to ARAC in March 2026
✓	Carbon baseline for HCPC now established with action plan for improving sustainability being developed with expert input and involvement of ELT and SLG.
✓	Publication of gender, ethnicity and disability pay gaps report 2024 (published 27/04/25)
✓	Fee levels under review for future sustainability.
✗	Income/cost pressures of the increase to FTP cases, while the number of registration applications has come down.
✗	Forecasting model insufficient, need to consider a wider range of impacts.
✗	Two large programmes of work - hospital managers and reg reform will have significant financial impact
✗	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

Due to the continuing increase in FTP applications and legal cost, and the number of international registration application significantly decreasing, the impact and likelihood have both increased. This brings the risk score up to 16, reflecting it is significant and likely.

**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. NAO. Finance business partner challenge and budget setting principles agreed by ELT to challenge the business on efficiency	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
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.	Adherence to Partner processes in relation to recruitment, onboarding and Partner Code of Conduct (updated Jan 2024)
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 and seeks to identify	Effective IT system design maintaining confidentiality, integrity and availability of data. Digital transformation strategy provides roadmap for improving our IT systems.
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 such as data protection, bribery,	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 and processes.
Employee Forum acts as a consultation group for organisational change.	ELT monthly monitoring of productivity of all departments through detailed performance reporting. KPIs reported to Committees and Council for oversight of performance and progress in meeting agreed milestones for corporate plan.

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
<b>Delivering the technology roadmap</b> 	As part of wider customer contact strategy replace our legacy telephony solution to enable further improvements in the way we interact with registrants and other stakeholders who contact us (see milestone 2) (Q4) Contract signed Scope and develop a foundational single CRM that will create a platform for bringing together all our customer information (Q4) Complete our journey to the cloud by decommissioning our remaining on-premise technology services and replacing these with future-proof cloud base services" (Q4) Finalising investment case Continue to develop and enhance the data platform to provide a single version of truth for HCPC data and enable work on data driven insights. Ongoing	The tech roadmap gives us a multi year plan to develop our digital and tech capabilities.	In November the All Employee Development Day was held, including the opportunity for all staff to collaborate on innovative investment ideas. The day was well received and had the largest attendance to date.
<b>People strategy</b> 	Deliver year 5 of our People Strategy: focus on attracting high quality candidates via our recruitment portal and workforce planning to build future resilience. Recruitment activities continue to be of priority. 24 new campaigns in Q2, 1012 applications received, 81 new CV's added to our talent network pool and 34 job offers made. Workforce planning underway. Develop an updated People Strategy for the future to ensure that the HCPC continues to benefit from a highly engaged and capable workforce (Q4) Monitor the impact of the introduction of the Freedom to Speak Up Guardians scheme (Q4) Maintain other speaking up and listening opportunities including Let's Talk sessions with senior leaders, the Employee Forum and our regular pulse surveys (Q4)	The people strategy ensures we are recruiting and retaining high quality employees. It also supports the wellbeing of our staff.	In November two new all staff mandatory e-learning courses launched in November: AI - Safe and Compliant AI use for All Staff and Sexual Harassment (HCPC) - 2025  On 23 October the HCPC annual report and accounts 2024-25 was published
<b>Improving financial sustainability and resilience</b> 	Continue with regular, transparent fee reviews to maintain the HCPC's financial sustainability and enable investments in further improvements. Planning under way for next consultation (Q4) Further develop our financial and procurement systems, to help ensure value for money and continued improvements in financial management, including through invoice processing automation (Q1 <b>Complete</b> ), more efficient accounting for registrant income (Q1 2025-26) and use of improved, AI-enabled reporting tools (Q3)	Resilient financial capabilities improves the sustainability of the HCPC	
<b>Improving our environmental sustainability</b> 	Maintain and optimise the HCPC's office estate to provide a safe and sustainable working environment, including progressing plans to end our reliance on gas-powered heating (Q4) On-track Implementation of an Environmental Management System to improve our ability to monitor the environmental impact of our operations (Q3) On-track Enhance procurement policy to include a focus on sustainability and supplier diversity (Q2)	As a modern and conscientious organisation our environmental sustainability plan ensures we are in line with requirements.	

**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.

**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.

Date	Risk Owner
Sep-25	Executive Director of Education, Registration & Regulatory Standards Executive Director of Corporate Affairs





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

← Change No

Current Risk Influencers	
✓	The Government have confirmed in a Written Ministerial Statement, its commitment to reforming the regulation of healthcare professionals across the UK and delivering legislation relating to the Health and Care Professions Council in this Parliamentary period.
✓	DHSC have confirmed that the HCPC is a priority for regulatory reform along with NMC, though timeline not yet confirmed
✓	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.
✗	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.
✗	NHS Manager barring scheme - Further clarity and planning needed to manage this new approach to regulation. Demonstrates HCPC will thought off and high profile, but must be managed carefully
✗	Government leadership changes, and challenges in the health landscape could impact on the progression of regulatory reform due to other priorities.
✗	The impact of the wider health regulator landscape, e.g. NMC culture and whistleblowing reports, GMC times article, etc.

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. Risk reduction also requires greater clarity on timing of HCPC's reform and confidence that funding and resources in place realise the opportunity of reform.	
<b>Current risk level is within risk appetite</b>	

Mitigations in place	
Communications and strategic engagement, including parliamentarians and cross-party engagement, on regulatory reform supported by Luther Pendragon.	Participation in cross regulator analysis of draft legislation and other regulatory themes, HCPC's comments on draft legislation have been provided.
HCPC engagement on Health and Social Care Bill led to positive change.	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 reform.
Some dedicated policy resource in place.	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 2025-26	Mitigation	Reporting period commentary
<b>Education</b> 	Help education providers and others understand our regulatory requirements, and current sector trends, by considering our assessments from the 2024-25 academic year, building on previous analysis, and publishing / engaging on key findings, in a user focused way (Q3) We have published insight from our assessments from three academic years, including the 2023-24 academic year. This information was future proofed, and will be updated with findings from the 2024-25 academic year in Q3.	Supporting understanding of the value that regulation adds	On Wednesday (5 November) members of the HCPC Council and Executive Leadership Team held an event at the Houses of Parliament in Westminster, to meet with a range of MPs, peers and officials. The event was hosted by Sonia Kumar MP, who continues to be a registered physiotherapist, and an active champion for the professions we regulate.  The drop-in session gave parliamentarians the opportunity to meet the senior team at HCPC, including our Chair and Chief Executive, and learn more our regulatory work, as well as about the importance of the professionals on our register.
<b>Registrant health and wellbeing</b> 	Review our progress against and the impact of the Registrant Health and Wellbeing Strategy, identifying any further work we can undertake to improve the experience of our regulatory processes for those involved (Q3) Recruitment live for new Head of Professional Liaison and Outreach. This action will form part of the role once in post.	As a companionate regulator, supporting our registrants health and wellbeing can positively impact patient safety	
<b>New registrants transition to UK practise</b> 	Through our Insights for Employers programme and the Employer Hub, increase understanding of the challenges faced by registrants who are new to UK practice, and encourage and support employers to improve the narrative around and support for international registrants Employer insights session around preceptorship for international registrants was delivered in September, this was recorded so will continue to be available. A webinar designed for those who lead, employ or manage HCPC registrants to learn how to support international registrants on your team using the principles for preceptorship, a set of practices that have been proven to increase staff retention. Joining the UK workforce workshops transitioned to be more in person.	Supporting registrants new to UK practice supports addressing the workforce crisis	
<b>Shaping the future of regulation</b> 	Continue to raise the benefits to patient safety and the quality of care that regulatory reform will bring when meeting with stakeholders and responding to relevant departmental consultations (Q1-4) Ongoing engagement and contribution to the DHSC's regulatory reform work (Q1-4) Engaging with DHSC and share feedback and position statements on the draft GMC order. This is moving at fast pace. DHSC is looking to consult on GMC order in December Chair engaging with Westminster forum on the future o regulation.	Increased engagements with wider stakeholders ensure understanding the value of our work, encouraging support for reg reform changes	