

THE HEALTH AND CARE PROFESSIONS COUNCIL

RISK ASSESSMENT June 2013

Chief Executive

Ref	Category	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jan 2013	Likelihood before mitigations Jan 2013	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jan 2013	RISK score after Mitigation Sept 2012
	Strategic	1.2	Unexpected change in UK legislator Links to 2.2, 15.14	Chief Executive	5	2	10	Relationship with Government depts	Lobbying	-	Low	Low
		1.3	Incompatible St Sec 6.2 & Health Bill and EU legislator	Chief Executive	1	3	3	Monitoring of EU directives e.g. Professiona Qualifications Directive	Membership of Alliance of UK Health Regulators on Europe (lobby group)	-	Low	Low
		1.4	Failure to maintain a relationship with PSA (formerly CHRE)	Chief Executive & Chair	5	1	5	HPCP Chair and Chief Executive relationship with PSA	Communications	-	Low	Low
		1.5	Loss of reputation	Chief Executive & Chair	5	4	20	Quality of operational procedures	Quality of governance procedures	Dynamism and quality of Comms strategy	Medium	Medium
		1.6	Failure to abide by current Equality & Diversity legislation	Chief Executive	4	2	8	Equality & Diversity scheme	Implementation of scheme for employees Implementation of scheme for partners	Equality & Diversity working group	Low	Low
		Corporate Governance	4.8	Improper financial incentives offered to Council members/employees	Chair and Chief Executive	4	2	8	Gifts & Inducements policy	Council member code of conduct	Induction training re: adherence to Nolan principles & Bribery Act 2010	Low
	HR	11.1	Loss of key HCPC employees	Chair, Chief Executive and EMT	4	4	16	Chief Executive succession plan held by HR Director. Succession planning generally.	Departmental training (partial or full) and process documentation	-	Low	Low
		11.4	Lack of technical and managerial skills to deliver the strategy	Chief Executive	4	3	12	HR strategy and goals and objectives (buy in the skills v staff upskilling on the job v training)	Training needs analysis & training delivery.	Some projects or work initiatives delayed or outsourced	Low	Low
	Legal	12.1	Judicial review of HCPC's implementation of HPO including Rules, Standards & Guidance Links to 1.2, 14.1, 14.2	Chief Executive	5	3	15	Consultation. Stds determined by PLG's. Agreement by Council.	Appropriate legal advice sought	-	Medium	Medium
		12.2	Legal challenge to HCPC operations	Chief Executive	4	4	16	Legal advice and ISO	Communications	-	Low	Low
	Finance	15.2	Unexpected rise in operating expenses Link to 13.1	EMT	3	1	3	Budget holder accountability for setting budgets and managing them. Timely monthly reporting and regular budget holder reviews held. Finance & Resources Committee review of the monthly variances year to date.	Six month reforecasts with spending plan revisions as feasible and appropriate.	Legal cost insurance for FTP cases. Capped FTP legal case costs.	Low	Low
		15.3	Major Project Cost Over-runs Links to 8.1-8.4 Links to 15.17	Project Lead / EMT	4	2	8	Effective project specification including creating decision points. Effective project management and timely project progress reporting (financial and non financial).	Creation of a project capex contingency budget. Project exception reports including revised funding proposal is presented to EMT for approval.	Finance & Resources Committee review of the project spending variances to date	Low	Low
		15.9	Mismatch between Council goals & approved financial budgets Links to 1.1	Chief Executive	4	2	8	Close and regular communication between the Executive, Council and its Committees.	Adequate quantification of the budgetary implications of proposed new initiatives	Use of spending prioritisation criteria during the budget process with capex contingency amount held in reserve	Low	Low
		15.23	PSA full cost recovery model places excessive pressure on HCPC April 2013 onwards GSCC Pension not forthcoming from DH	Chief Executive & Finance Director	4	3	12	Communicate with PSA to understand potential models for cost recovery and feed back on impact on HCPC	Responded to forthcoming DH Consultation on Levy Methodology	Budget for projected amount at appropriate time.	Low	New
	Pensions	16.4		Finance Director / Chief Executive	4	4	16	Successful negotiation with DH	-	-	Low	Low

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Director of Policy and Standards

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14	Policy & Standards	14.1	Incorrect process followed to establish stds/guidance/policy eg no relevant Council decision	Policy & Stds Director	4	2	8	Legal advice and sign off sought on processes	Appropriately experienced and trained members of Policy team.	Quality mgt system & processes	Low	Low
			Links to 12.1									
		14.3	Changing/evolving legal advice rendering previous work inappropriate	Policy & Stds Director	4	2	8	Use of well-qualified legal professionals. Regular reviews.	Legal advice obtained in writing.	Appropriately experienced and trained members of Policy team and others eg HR.	Low	Low
		14.4	Inadequate preparation for a change in legislation (Health Professions Order, or other legislation affecting HCPC)	EMT	3	1	3	EMT responsible for remaining up to date relationships with governemnt depts and agencies.	HCPC's 5 year planning process	Legal advice sought	Low	Low
		14.5	PLG member recruitment without requisite skills and knowledge	Policy & Stds Director HCPC Chair, Secretary to Council(?)	4	1	4	Skills and knowledge identified in work plan	Recruitment policy	Council Scrutiny of PLG result	Low	Low
			Lnks to 4.10									
	NEW JAN 2013	14.6	Loss of Corporate Memory	Policy & Stds Director	3	3	9	Maintain appropriate records of project decisions	Appropriate hand over and succession planning	Department training	Low	New

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Head of Business Process Improvement

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2	Operations	2.1	Inability to occupy premises or use interior equipment Links to 1.2, 13.4	Facilities Manager	4	2	8	Invoke Disaster Recovery/Business Continuity plan	Commercial combined insurance cover (fire, contents, terrorism etc)	-	Low	Low
		2.3	Unacceptable service standards Links to 9.1, 10.4	Director of Operations	5	4	20	ISO 9001 Registration, process maps, well documented procedures & BSI audits	Hire temporary employees to clear service backlogs	Detailed workforce plan to match workload.	Low	Low
		2.5	Public transport disruption leading to inability to use Park House	Facilities Manager & Head Bus Proc	4	5	20	Contact employees via Disaster Recovery Plan process	Make arrangements for employees to work at home if possible	-	Low	Low
	Information Technology	5.3	Fraud committed through IT services	Director of IT	3	3	9	Appropriate and proportionate access restrictions to business data. System audit trails.	Regular, enforced strong password changes.	Regular externally run security tests.	Low	Low
	Quality Management	9.1	Loss of ISO 9001:2008 Certification	Director of Operations, Head of Business Improvement	4	3	12	Regular & internal audits	QMS standards applied across HCPC	Management buy - in	Low	Low
	Data Security	15.7	Registrant Credit Card record fraud/theft	Finance Director	3	1	3	Daily credit card payment reconciliation's in Finance dept - Streamline to Netregulate and bank statements.	Tight procedures to retrieve sensitive paper records from archive, rationalise records kept and retain sensitive current year records with security tagging.	Compliance with credit card record storage standards.	Low	Low
		17.1	Electronic data is removed inappropriately by an employee Links to 5.3	Director of IT	5	3	15	Employment contract includes Data Protection and Confidentiality Agreement	Adequate access control procedures maintained. System audit trails.	Laptop encryption. Remote access to our infrastructure using a VPN . Documented file encryption procedure	Low	Low
		17.2	Paper record Data Security Links to 15.7	Head of Business Improvement	5	3	15	Use of locked document destruction bins in each dept. Use of shredder machines for confidential record destruction in some depts e.g. Finance.	Data Protection agreements signed by the relevant suppliers. Dept files stored onsite in locked cabinets.	Regarding Reg Appln forms processing, employment contract includes Data Protection Agreement	Low	Low
		17.3	Loss of electronic data held by third party suppliers in the delivery of their services (general risk)	Director of IT and Director of Operations	5	3	15	Access is restricted to only the data that is necessary for the performance of the services.	Effective system processes including secure data transfer and remote access granted only on application and through secure methods. Physical transfer of back up tapes using a specialist company with locked boxes and sign out procedure.	Data Processor agreements signed by the relevant suppliers.	Low	Low
		17.4	Data received from third parties	Director of Ops, and Director of FTP	5	2	10	Read only, password protected access by a restricted no of FTP employees to electronic KN data.	Registrant payments taken in compliance with Payment Card Industry (PCI) Security standards ie with quarterly PCI testing.	Ensure third party data providers e.g. professional bodies provide the data password protected/encrypted/door to door courier/registered mail/sign in sign out as appropriate.	Low	Low