

18 September 2024

Strategic Risk Register – August 2024

Executive Summary

The presented report sets out the HCPC’s strategic risks as of August 2024.

The risk register details:

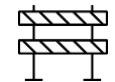





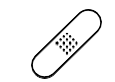

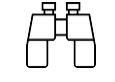





- recent actions or events that are reducing or increasing the risk;
- The risk score including the target score the executive is working towards;
- a description of how the risk relates to the HCPC’s risk appetite;
- current mitigations in place;
- progress on workplans, and how they mitigate the risk; and
- a commentary box outlines the changes to the risk since the last iteration (May 2024).

Previous consideration	The Committee reviews the strategic risk register at each meeting.
Decision	<ul style="list-style-type: none">• 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 November 2024.
Next steps	The Committee will receive the next report at their meeting in November 2024
Strategic priority	The strategic risks are relevant to all aspects of the Corporate Strategy 2021-26
Financial and resource implications	None
Author	Anna Raftery, Head of Assurance and Compliance anna.raftery@hcpc-uk.org
ELT Sponsor	Andrew Smith, Education, Registration & Regulatory Standards andrew.smith@hcpc-uk.org

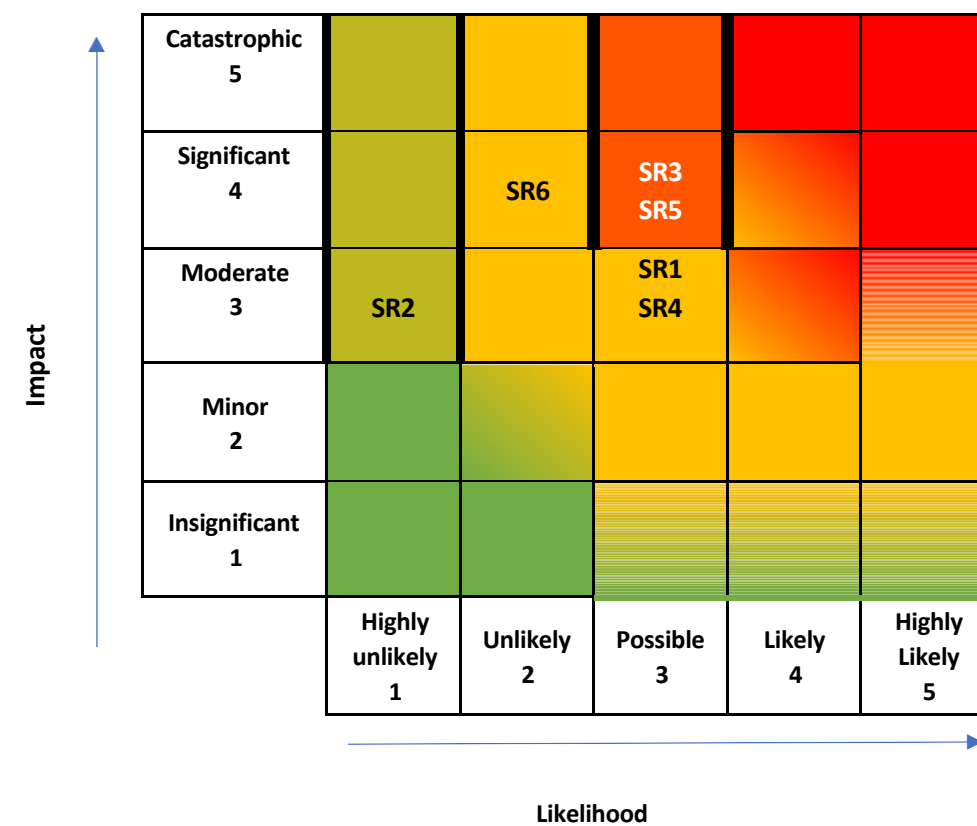
HCPC Strategic Risks

Summary of strategic risks

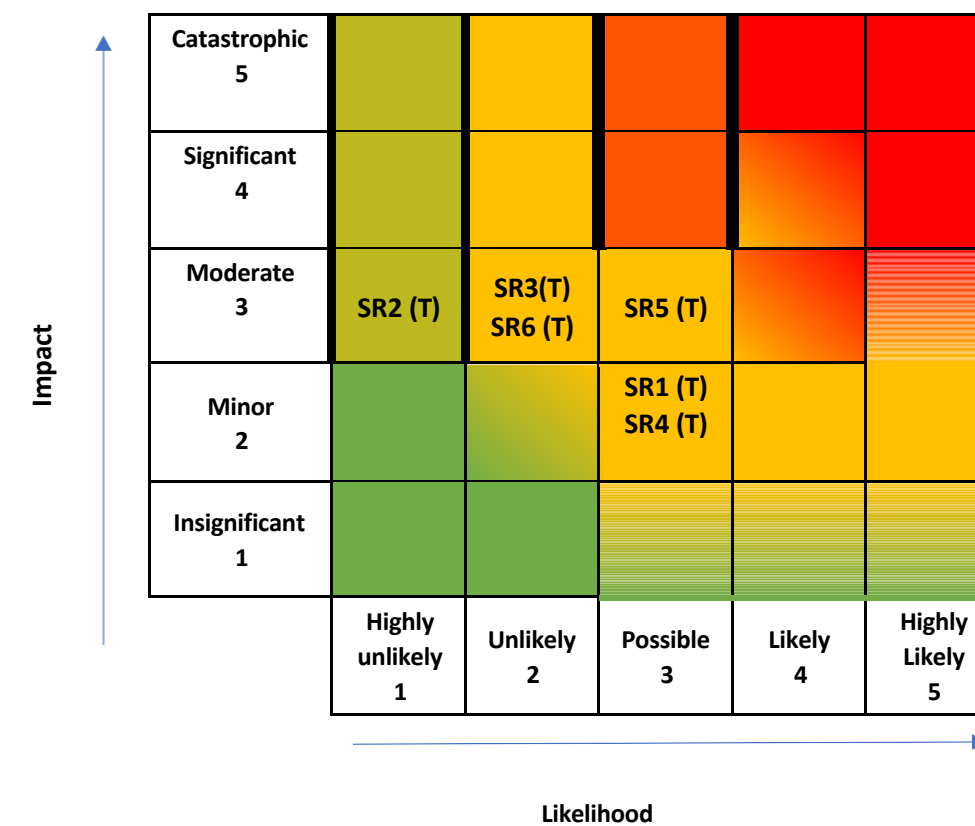
Strategy	Strategic Risks - High Level	Risk Description	Aug-24	Target Risk*
1 - Continuously improve and innovate - To improve our performance against PSA standards of good regulation and to innovate across all our regulatory functions to provide an enhanced user experience.	1. Our regulatory performance does not meet the expectations of our stakeholders and as a result stakeholders have negative experiences of our regulation	This includes the appropriateness of the timeliness and quality performance targets we set ourselves, being in line with the expectations of our stakeholders. This requires awareness of new developments within the regulatory sector and strong stakeholder engagement to ensure expectations are understood. This risk also relates to the experiences of those participating in our regulatory processes, for example registrants, witnesses, professional bodies and education providers.	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	This includes the quality and suitability of our standards and guidance in setting a threshold for safe practice which protects the public. It also includes how effectively we communicate our regulatory expectations, and the effectiveness of our professionalism and upstream regulation work.	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	This includes our effectiveness in collecting, maintaining, and utilising the data we need to be an intelligence driven regulator. It includes 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	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, like the impact of Brexit, devolution or a change in government as well as issues like workforce development.	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.	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). It includes 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. HCPC is unable to realise the benefits of regulatory reform, or these benefits are significantly delayed	Regulatory reform is an essential component to helping HCPC realise its strategic ambition to provide a more human and compassionate regulation through the timely and proportionate disposal of fitness to practice cases. Benefits also include greater flexibility to make process efficiencies, greater control over funding to enable financial sustainability in the long term and modernise governance structures. 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 - Our regulatory performance does not meet the expectations of our stakeholders and as a result stakeholders have negative experiences of our regulation

Risk Summary This includes the appropriateness of the timeliness and quality performance targets we set ourselves, being in line with the expectations of our stakeholders. This requires awareness of new developments within the regulatory sector and strong stakeholder engagement to ensure expectations are understood. This risk also relates to the experiences of those participating in our regulatory processes, for example registrants, witnesses, professional bodies and education providers.

Date	Risk Owner(s)
Aug-24	Executive Director of FTP and Tribunal Services Executive Director of Education, Registration and Regulatory Standards

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

Change **No**

Current Risk Influencers

- The 2023-24 PSA performance report published August 2024 shows we met 16 of 18 standards.
- We have continued to remain within our service standard of providing a first decision on an international application within 60 working days - we have been within our service standard since June 22.
- 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 FTP Improvement projects are in delivery, continued focus on embedding of tranche 1 benefits.
- Frontloading team has been resourced with Senior FTP Lawyer in post.
- + Wider tone of voice work to be scoped in order prioritise for the next phase of the project

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

- | | |
|--|--|
| <ul style="list-style-type: none"> ! Second line 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 PSA and DHSC. Regular self-assessment against PSA standards reported to Council. 🏆 Risk based 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. 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. | <ul style="list-style-type: none"> ! 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 🏆	New Registration operating model effective as of 1 July – number of vacant positions being recruited for. AI proof of concept extended for another three months by ELT, other opportunities to extend its use and carry out pilot are being explored alongside this Telephony system: dependent on work being prioritised elsewhere so will be delayed. Contact centre updated to provided Welsh language options, online portal updates deferred in line with Welsh Commissioner. Portal update has been deferred to Q3, 25.	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 Aug 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 it 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, includes changes to operating model and response to NMC and Somerville case. Finalised partners services agreements. Seeking legal advice on the implications of NMC and Somerville case for the HCPC. Focus on planning for new Partner payroll system underway as part of Project initiation.	Updating our approach to our Partner stakeholder operating model.	
Education 🏆	Scoping started to access and use more data from Higher Education Statistics Agency, and data work on the product backlog Investigating how to reduce regulatory burden for education providers, including collating work activity that has already taken place in this area such as piloting work in data use. Second element is around identifying organisations to work with more closely. ETC engagement will continue on this work, as well as engagement with other regulators.	Reducing burden on education providers, and collaborating closely, will help provide a better experience.	
FTP improvements/developments 🏆	In-house frontloading commenced in June 2024, with three out of four legal posts now recruited to. Scale of internal frontloading will be small initially whilst we build our experience and knowledge of these types of investigations. Investment case for review of our scheduling process has been approved and the review is underway. Scoping discussions commenced to inform review of sanctions policy.	The new FTP operating model, including frontloading, will allow us to provide more timely decisions for the most serious cases.	

Strategic risk 2 - The HCPC's regulatory expectations are not appropriate or not understood by registrants and other stakeholders

Risk Summary
This includes the quality and suitability of our standards and guidance in setting a threshold for safe practice which protects the public. It also includes how effectively we communicate our regulatory expectations, and the effectiveness of our professionalism and upstream regulation work.

Date	Risk Owner
Aug-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

Decrease ←

- Current Risk Influencers**
- Four country resource in place in PUR better enabling UK-wide prevention engagement.
 - Education team now has a regional model with relationship managers in place for each provider (divided by region)
 - Partnership working with NHS England on preceptorship principles (supporting new professionals transition to workplace) approved by Council and published. Implementation guidance published in November.
 - #mystandards 2024-25 events programme has commenced aiming raising awareness of standards requirements.
 - Revised SCPEs and guidance on social media live Sept 2024. Easy read guide for SCPEs has been produced, aimed at the public.
 - + Changing expectations of our professions' practice as a result of pressures on services, tech or societal events.
 - + 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**
- | | |
|--|---|
| <ul style="list-style-type: none"> Public consultation process in place Engagement with key stakeholders/experts for widescale profession specific changes to standards. Guidance provided on meeting our standards, #mystandards webinar series. Dedicated website hubs for registrants, students, employers, members of the public, education providers. | <ul style="list-style-type: none"> Policy enquiries function available to support understanding and application of our standards. Regulatory approach to advanced practice defined and agreed by 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 Comms in place |
|--|---|

Areas of Development	Progress 2024-25	Mitigation
SCPEs implementation and SETs review 	Implementation work going ahead for SCPEs, working with teams across business. Includes updating supporting guidance materials, making amendments – there will be additional work post implementation Commenced review of SETs, plan to ETC (March 2024) and now moving in to phase 2 – formulating proposals phase.	Communication and guidance plans built into our standards reviews.
English Language 	Results from public consultation published (7 June 2024) New requirements expected to come into place in early 2025. The country list and list of test providers is being reviewed and Business Change is supporting system changes needed. An update will go to ETC in September 2024.	The new English Language requirements will bring us inline with other regulators - broadly consulted on

Reporting period commentary

Public consultation for the English Language requirements had one of the most extensive EDI impact assessments completed, learning will feed into consultation SOP going forward.

The #mystandards events have had good attendance is at a high.

Therefore risk score has reduced.

Strategic risk 3 - We are unable to harness the benefits of the wealth of data we hold

Risk Summary

This includes our effectiveness in collecting, maintaining, and utilising the data we need to be an intelligence-driven regulator. It includes 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				
Aug-24	Executive Director of Education, Registration & Regulatory Standards				
	Impact	Likelihood	Risk Score	<div style="border: 1px solid black; padding: 2px;"> Change No </div>	
Inherent risk	5	x	4		20
Current Risk	4	x	3		12
Target risk	3	x	2	6	

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.
- 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.
- % 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.
- + Quality and completeness of underlying data causing delays to analysis as significant cleansing work required. Information and Analytics team working with operational teams to resolve and mitigate against continued imputing of new bad quality data.
- + Ongoing risk of single point of failure for operational performance data reporting. Capability and capacity challenging, focus on progressing automation in Q1-2.

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

- | | |
|--|---|
| <ul style="list-style-type: none">  Publication of FTP, education and registration information and datasets through annual reports and 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. | <ul style="list-style-type: none">  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
 <p>Research</p>	Commenced scoping and early conversations internally and with ETC/Council colleagues to inform AI research piece prior to commissioning. Initial conversations with Professional Liaison team on research to explore professional boundaries with a focus on sexual misconduct underway.	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 ensure accountability. Risk score has not changed
 <p>Continuing to improve data quality/infrastructure</p>	Minimum data sets for registration and education complete, FtP needs to be finalised. Progress in terms of developing plans for data platform. Automated ftp council paper data.	Establishing MDS to support better use and consistency of data	
 <p>Insights and Analytics</p>	Analysis of FtP case outcomes by diversity characteristics will be included and published by the end of Q3, on target. Principal Analyst now in post who will lead on the new registrant retention rate analyses. Data sharing initiatives commenced via sharing of data with the Chartered Society of Physiotherapy. With IT, exploring managed API (application programme interface) solution to enable on a broader scale to share with other prof bods.	Using the data available to us to understand our registrants, and share this data with our stakeholders	










Strategic risk 4 - We do not understand our stakeholders needs and so are unable to be as effective a regulator as we can be	
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, like the impact of Brexit, devolution or a change in government as well as issues like workforce development.





Date	Risk Owner																				
Aug-24	Executive Director of Education, Registration & Regulatory Standards Executive Director of Corporate Affairs (M)																				
	<table border="1"> <thead> <tr> <th></th> <th>Impact</th> <th></th> <th>Likelihood</th> <th>Risk Score</th> </tr> </thead> <tbody> <tr> <td>Inherent risk</td> <td>5</td> <td>x</td> <td>5</td> <td style="background-color: red; color: white;">25</td> </tr> <tr> <td>Current Risk</td> <td>3</td> <td>x</td> <td>3</td> <td style="background-color: orange;">9</td> </tr> <tr> <td>Target risk</td> <td>3</td> <td>x</td> <td>2</td> <td style="background-color: yellow;">6</td> </tr> </tbody> </table>		Impact		Likelihood	Risk Score	Inherent risk	5	x	5	25	Current Risk	3	x	3	9	Target risk	3	x	2	6
	Impact		Likelihood	Risk Score																	
Inherent risk	5	x	5	25																	
Current Risk	3	x	3	9																	
Target risk	3	x	2	6																	

Change
No

Current Risk Influencers	
-	Professional liaison consultants in place in each of the 4 UK countries, improving our reach for engagement work.
-	Education team now has a regional model with relationship managers in place for each provider (divided by region)
-	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.
-	Service user engagement focus groups undertaken for SCPE review.
-	The Communication Strategy 2024-26 was approved by council in July 2024.
-	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.
+	Business case for a CRM not taken forward in investment prioritisation for 2023-24. Over the year we will better scope our needs to make the case for the following years submission.

Risk Appetite
Influence and 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

Mitigations in place	
<ul style="list-style-type: none">  ELT relationship building and liaison with key stakeholders particularly Government Departments, professional bodies, other regulators, unions.  Personal engagement plans for Chair & Chief 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 & internal EDI employee forum. 	<ul style="list-style-type: none">  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.  Interim stakeholder CRM in place to improve stakeholder engagement management and insights.  Office of Chair and Chief Executive established

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 (Sets review may take place next FY). Review and develop longer term plan for service user engagement based on learning from our first year of working in partnership with a patient and service user representative body (Q4)	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 is dependent on online concerns portal go live -currently a Q4 go live. Reg EDI data analysis has commenced; internal meetings underway on analysis. Completed first tranche of analysis. Scoping 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.	Gathering further EDI information in order to identify any bias or unintended consequences in our decision making process.	
Stakeholder engagement 	Forward programme in place with three CEO visits to healthcare provider sites completed and two further visits scheduled for the calendar year, across the four nations. The Chair will be speaking at the Association of perioperative practice annual conference (2 August) and further events are in the pipeline. Evaluation planned with stakeholder feedback to measure and evaluate the impact of our current engagement fora, such as the professional bodies forum. good current trends/evidence.	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 GMC who are looking at setting up their version so sharing some learning from the hcpc scheme. Also engaging with other organisations.	Ensuring more diverse voices on council informing decisions.	

Strategic risk 5 - The resources we require to achieve our strategy are not in place or are not sustainable

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

Date	Risk Owner
Aug-24	Executive Director of Resources

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

← Change No

- Current Risk Influencers**
- Budget factors in projected future benefits of investments, to be validated at project initial phase and tracked to ensure deliver.
 - 23-24 balanced budget achieved. Draft 24-25 balanced budget, medium term financial plan.
 - November 23 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. APDR participation for 23-24 was 100%. Aspiring leaders, Beyond Barriers and reverse mentoring L&D programmes launched.
 - Business Central finance system live from April 2024, improving financial control and reporting. Phase 2 in progress.
 - Carbon baseline for HCPC now established with action plan for improving sustainability being developed with expert input and involvement of ELT and SLG.
 - Change and Benefits Forum established, reporting to ELT to strengthen change management and ensure delivery of benefits.
 - Restructure of ELT live from 1 Nov 2023, with maternity cover appropriately planned to mitigate gap.
 - + Legal position on partners' employment status determined, following judgement in 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

<ul style="list-style-type: none"> ! 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 🚚 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 and 🏆 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 👁️ Employee Forum acts as a consultation group for organisational change. 	<ul style="list-style-type: none"> ! 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 Council for oversight of performance and progress in meeting agreed milestones
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Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
Update HCPC Fee model 🚚	Develop framework for regular fee reviews to provide clarity about our future funding needs and ensure that the HCPC continues to be adequately funded and so can meet its statutory responsibility to safeguard patient safety while being ambitious about delivering high quality, effective regulation and services - Completed Consult on changes to fees recommended by the next regular review, for implementation in 2025 (Q1-2)	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 an independent culture review which showed damning evidence for 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 going really well with really high numbers for applications, careers fayre at oval well attended by candidates. promoting ftp and reg roles. rolling out new learning and development programmes, AL due to start in September. Data apprenticeships started. Monitoring equality and diversity presented to ELT and PRC quarterly. Introducing a Speak Up Guardian role to support staff - Development underway	The people strategy is in place to improve retention, recruitment, and culture	
Digital transformation 🏆	Complete initial build of our modern data platform - Work underway alongside Business Change 2 on investment phase. Technology roadmap review in progress and PRC/Council engaged. User experience improvement is on track and pilot successfully completed on email tree work and in conversations about next steps.	Modernising our data platform and approach is needed to ensure we are sustainable and effective	
IT security modernisation 🚫	Update our systems with new capabilities. Work continuing with rolling out E5 and working on investment case for next phase.	Modernising our IT security is needed to ensure sustainability	
Environmental Sustainability 🚫	Move to renewable energy source (electricity) (Q1), done Evaluation criteria for procurement processes developed, in final stages for implementation Environmental management system in place and plans for ongoing development: early stage version in place, reporting on direct emissions but not indirect emissions (internal reporting) Ongoing work with Employee Forum to develop sustainability workstream. ELT/PRC/Council presentation.	As a modern and conscientious organisation our environmental sustainability plan ensures we are in line with requirements.	
Business Central Phase 2 🚚	Invoice automation work dependent on investment cases, which are being developed with Business Change. Delayed to Q2 due to IT security requirements, working with IT team on this part. Deferred income module pushed back to Q3-4 now. Contract management module pushed back to Q4. KPI and dashboard reporting on track per plan.	Delivery of phase two of business central is required to complete the modernisation of our financial systems	

Strategic risk 6 - HCPC is unable to realise the benefits of regulatory reform, or these benefits are significantly delayed

Risk Summary
Regulatory reform is an essential component to helping HCPC realise its strategic ambition to provide a more human and compassionate regulation through the timely and proportionate disposal of fitness to practice cases.. Benefits also include greater flexibility to make process efficiencies, greater control over funding to enable financial sustainability in the long term and modernise governance structures. 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
Aug-24	Executive Director of Education, Registration & Regulatory Standards Executive Director of Corporate Affairs (M)

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

Change
No

- 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 s.60 order. 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.
 - HCPC has engaged with DHSC on how the recommendations of KPMG on the future regulatory landscape may be taken forward. DHSC have indicated that this will not be progressed as a priority, with the S.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 22-23 and contingency in 2023-24 budget.
 - + While 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 HCPC dedicated to reform.

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 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.	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
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 2024-25	Mitigation	Reporting period commentary
Increase engagements with and influence of employers 	Delivered one "insight for employer's webinar" with others planned and in development to be delivered in the Autumn and Winter. Increase in reach has meant a higher % of those signing up to the webinars. Delivery our Professionalism in practice programme to support registrants and employers to embed and achieve the standards on track	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 & NMC. Scoping meeting with DHSC meeting with officials for lessons learned and requirements for HCPC with a view to put together a timeline. We have had the opportunity to review both the GMCs rules and the NMCs 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 	Two sessions delivered this year to encourage employers to provide greater support for registrants who are new or returning to practice, and those moving into UK practice for the first time this year. Workshop scheduled for Q2 to promote our preceptorship principles	Supporting registrants new to UK practice supports addressing the workforce crisis	
Increase engagement with learners 	Three sessions delivered to students with further sessions happening in September of our "Becoming a health and care professional" programme. The programme is currently being updated to reflect the new standards. 3rd Student competition is live with a closing date of 1st September 2024.	As above	
Communication strategy 	The Communication Strategy 2024-26 was approved by council in July 2024. This details plans to deliver three key workstreams: Delivering high quality communications across our corporate channels. Building the communication function. Developing the organisations communications capabilities.	As above	
Education annual reporting 	Engagement with the education sector in progress with four webinars completed and three scheduled. Positive uptake on attendance with a combined total of 364 across the four webinars. Kicking off data gathering for state of nation report for the 2023-24 academic year.	As above	