Audit Committee, 15 March 2017

Internal audit – Review of recommendations

Executive summary and recommendations

At its meeting on 29 September 2011, the Committee agreed that it should receive a paper at each meeting, setting out progress on recommendations from internal audit reports.

Most of the information in the appendix is taken from the wording of the internal audit reports. The exception is the 'update' paragraph in the right-hand column, which provides details of progress.

Recommendations which have been implemented have been removed from this report. The original numbering of recommendations has been retained.

Decision

The Committee is requested to discuss the paper.

Background information

Please refer to individual internal audit reports for the background to recommendations.

Resource implications

None

Financial implications

None

Appendices

None

Date of paper

Ï March 2017

Recommendations from internal audit reports

Core Financial Systems – Payroll (report dated September 2011 – considered at Audit Committee 29 September 2011)

Assurance on effectiveness of internal controls: Substantial Assurance

Recommendations summary

Priority	Number of recommendations
Fundamental	None
Significant	None
Housekeeping	3

Risk 3: Financial losses arising from fraud or error, inefficient processing or inappropriate activity (such as ghost employees, payment of staff who no longer work at the Council, authorised payments, etc)

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
2	*Observation:* Finance receive an HR Pack on a monthly basis which includes the HR Summary spreadsheet and relevant supporting documentation detailing starters; leavers; contractual variations; acting-up allowances; changes to address etc. Whilst our review confirmed that this information was received by Finance, in a timely manner and before the deadline of the 15th of the month, as there is currently no direct interface	As part of the planned review of the HR system, consideration should be given to a more effective interface between the HR and Payroll systems to avoid duplication in entry of data.	Housekeeping	Project proposal to review HR & partners information systems, including link to payroll to be submitted to Executive team in November 2011. If agreed will form part of 2012/13 project plan.	Director of Finance/ HR Director. **Update** **15/03/2017** – Cleared. The new payroll bureau service went live in December. All pay changes except for season ticket loans are now derived from the HR system, so there is no duplication of data entry **Previous updates**: 22/11/2016 – new payroll bureau service is being tested via a parallel run in November, and is due to go live in December. 06/09/2016 – On track, no change from 15/06/16 update 15/06/2016 - we have signed a contract with the supplier of the HR and partners system for their payroll bureau service, and the new service is

	Observation/Risk	Recommendation	Priority	Management response	Timescale/ responsibility
	between the HR Systems and Sage, the information has to be entered again on to Sage. It is noted that a review of the HR system is planned to be undertaken. *Risk:* Holding two databases with staff details and duplication of data entry are unlikely to be an efficient use of resources. Errors are more likely to arise where data is re-keyed.				expected to go live during 2016/17. The payroll software is integrated with the HR system so duplication of data entry will be avoided. 16/03/2016 - we have reconsidered the option of using the supplier of the HR and partners system, and have conducted an information security audit on their systems, with satisfactory results. We are currently in negotiation with the supplier over contract terms. 26/11/2015 - On track, no change from 17/6/15 update 08/09/2015 – On track, no change from 17/6/15 update 17/06/2015 – The payroll service offered by the supplier of the new HR and Partners system is not appropriately certified for information security, so we are reviewing other options for the contracted out payroll service, expecting to conclude by the end of 2015-16. We still intend and expect the new HR system to better integrate with payroll, whichever option for payroll is chosen. 10/3/2015 – We have started discussions with the supplier of the HR and Partners system to identify whether their integrated payroll service would be suitable for our needs. 09/10/2014 – The HR and Partners system build business case was approved by EMT to enter the start-up phase on 9 September. A supplier has been identified. 24/06/2014 – Still pending the HR & Partners project. Bids from suppliers have been received and are being assessed but no contract yet awarded so the project has not yet entered the build phase. 20/03/2014 - HR & Partners Systems Review phase is due to end on 31 March 2014. The project will then enter the build stage.

Review of five year plan model functionality and controls review (report dated November 2015 – considered at Audit Committee 26 November 2015)

This report was not presented in traditional observation/recommendation/management response format. Observations that did not have an associated recommendation and recommendations that have been implemented have not been reproduced. The following recommendations are still open.

	Recommendation	Priority	Management response	Timescale/ Responsibility
Income section of the model				
	We would recommend that the model is subject to future testing, particularly where structural changes are made. For example such testing could involve running through test data scenarios. HCPC may also wish to consider undertaking a full model review when substantial changes are made.	Medium	Agreed	Finance Director **Update** 15/03/2017 – Cleared. A review of the model has been undertaken by Grant Thornton and separately reported to the Committee. This does not however include the planned changes to integrate the FTP section of the model with FTP's own workforce planning system: that work has started but is still underway. **Previous updates** 22/11/2016 – the model has been further developed (details below) but work with FTP on integration of the model with their workforce planning and management information systems is outstanding. We will carry out the full review when that work is complete. 06/09/2016 – as noted below, we continue to develop the 5 year plan model with the support of Grant Thornton. Changes to individual sections are tested by comparing outputs before and after the change. We will carry out a full review when the current round of changes is complete. The individual changes are expected to be completed by

Recommendation	Priority	Management response	Timescale/ Responsibility
			November 2016 and the full review should be completed by the end of 2016-17.
Fitness to practise section of the model			
We did not identify any major issues with inserting new data to reforecast the 5 year plan based on updated actuals. We do however recommend inserting a model version tracker as a way of assessing performance against the budget and long term forecasts. We note that it is not currently possible to change the forecast dates for FtP costs independently to other calculations and understand this functionality may be helpful. One approach would be to insert a flag to limit changes to forecast and actual periods to only the FTP sections of the model. However when implementing this we would recommend that this is clearly reported to users so they are aware of assumptions being used	Low	Noted, though to reforecast, the start and end date of the budget actuals would need to change, which impacts on registrant numbers calculated elsewhere.	Finance Director / Director of Fitness to Practise **Update** 15/03/2017 – The work has started but is still underway **Previous updates** 22/11/2016 – This work has slipped and is now starting in November with the aim of completing by the end of the financial year.
We have observed that the model can cannot currently be used for sensitivity analysis or as a resource /workflow planning tool. In the models current state the addition of monthly updates to enable resource planning and effective reforecasting would require a periodic freeze of the registrant assumptions. This would also drive the need for a reconciliation/ logic check between the frozen and updated registrant values. Implementing this would require an update of the model with sufficient testing to ensure a robust procedure for updating inputs and reconciling frozen values.	Low	Noted and agreed. We'd want to do this to assist with future budget planning and resource management, especially to monitor the impact of planned changes in FTP processes and structures.	06/09/2016 – Finance and FTP are working together with the aim of integrating the FTP module of the 5 year plan with FTP's workforce planning and management information systems. These recommendations will be considered as part of that work, due to complete by November 2016.

Core financial controls review (report dated May 2016 – considered at Audit Committee 16 June 2016)

Recommendations summary

Priority	Number of recommendations
High	None
Medium	3
Low	5

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
1	At the time of our review, HCPC were not holding regular meetings with their outsourced payroll provider (Access) to discuss common payroll processing errors and/or contract performance. Furthermore, HCPC are not receiving regular reports from Access on key performance indicators (KPI) or service level agreements (SLA). HCPC are in the process of determining who will be the relationship manager for the new outsourced payroll provider (Core). Until this relationship manager is appointed, KPI and SLA reporting, and regulation contract meetings need to be formalised. Without regular meetings and reports from Access, there is a risk that poor performance is not identified and resolved in a timely manner.	HCPC should appoint a relationship manager for the new payroll service provider as soon as possible. Consideration should be given to this role sitting with the HCPC HR team given the service provider are also developing and supporting a new HR system. HCPC should also agree with Core the nature of regular contract meetings and KPI / SLA reporting are required. These meetings and reports should be formally documented as part of the contract between HCPC and Core.	Medium	For the new payroll bureau system, a relationship manager will be appointed to deal with general queries with the supplier and to hold meetings with CoreHR. This person is likely to sit with HR, however Finance will communicate findings from monthly check to HR and assist in setting KPIs and attending meetings when required. HR department will hold the contract with Core. *Date Effective:* Nov/Dec 2016 (Implementation of new payroll bureau system) *Owner:* HR department	Head of Financial Accounting/ Human Resources Manager **Update** 06/03/17 – Completed A relationship manager has been appointed and KPI and SLA meetings have been incorporated into the contract with the supplier **Previous updates** 22/11/2016 – go live is now planned for December following a parallel run in November 06/09/2016 - On track, contract has been signed with the new payroll provider and implementation is underway leading to

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
					planned go live in November 2016
2	HR are responsible for managing pension and corporate gym membership payroll deductions from HCPC employees. The deductions themselves are calculated by the outsourced payroll provider (Access) as part of wider payroll calculations. A periodic review of pension and corporate gym membership payroll deductions is not being conducted by HR to ensure these remain up-to-date (e.g. corporate gym membership is still being used by the employee) and accurately reflect internal records held by the HCPC HR team (e.g. employee pension contribution levels). Pension reports are generated by both Access and HCPC Finance which set out the monthly pension deductions for each employee. Whilst these reports could be used to perform a reasonableness check of pension deductions, they do not enable completeness or accuracy of pension deductions to be assessed. Without regular, independent checks of payroll deductions by HCPC, there is a risk that payroll payments made to employees are not accurate.	HR should conduct a periodic review of all pension and corporate gym membership payroll deductions against outsourced payroll provider records. This review should look to ensure that payroll deductions are only being taken from employees who have corporate gym memberships and/or have not opted out of pension contributions. Furthermore, this review should also include a spot check of payroll deductions to ensure these align with supporting records maintained by HR (such as pension contribution levels).	Low	The gym deduction amount is confirmed by HR and then communicated to Access. The gym deduction amounts have been confirmed with employees for 2015-2016. Next review is due November 2016. Currently Finance do checks on the payroll deductions, however this is not well documented and the checks only apply to changes recorded in the check report from HR. The rate of all current employee and employer pension contributions will be checked. Going forward under the new HR system, we will ensure deductions are reviewed and spot checks are done by the HR department each month. Checklists will be produced to ensure this is done and reviewed. *Date Effective:* Pension contribution checks by end of June 2016. Other actions in Nov/Dec 2016 (aligned with the implementation of new payroll bureau system) *Owner:* HR department	Head of Financial Accounting/ Human Resources Manager **Update** 06/03/17 – the Finance department is in the process of correcting the errors that were found. A delay occurred due to incorrect information being provided by our previous payroll bureau The new system has gone live and includes monthly reviews of deductions carried out by the HR department **Previous updates** 22/11/2016 – go live is now planned for December following a parallel run in November 06/09/2016 - On track, contract has been signed with the new payroll provider and implementation is underway leading to

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
					planned go live in November 2016. All current employee and employer pension contributions were checked in the August payroll, and a small number of errors have been found. We will contact the employees concerned by the end of September to make the corrections.
3	HR employees we spoke to as part of this review noted that the current payroll reports prepared by Access do not present information in a way that meet their needs. In particular, it was felt that current reports present information in an overly complex format, hindering HR's ease of payroll oversight and review. For example, Access generate a 'Net Pay' report which sets out the changes made to payroll masterfile that month. This report, whilst received by HR, is not currently being reviewed as part of the authorisation of payroll. HR are instead reviewing payslips for those employees whose payroll masterfile data has changed.	HCPC should work with the new outsourced payroll supplier, Core, to ensure that payroll reports are fit-for-purpose to allow oversight and review of payroll by HR.	Low	Monthly checks are done on payslips and the payslips will show deduction items. The current reports are not user friendly and this is something we will focus on when designing the reports for the new system. During the designing phase of the new payroll system, we will hold several meetings with the supplier to ensure reports meet the need of both HR and Finance departments and will be user friendly. Date Effective: June – October (Designing phase of the payroll bureau system) Owner: HR/Finance	Head of Financial Accounting/ Human Resources Manager **Update** 06/03/17 – Reports are being built which will meet the needs of both the Finance and HR departments. Additional reports can be built by both HR and Finance departments as required **Previous updates** 22/11/2016 – go live is now planned for December following a

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
					parallel run in November
					06/09/2016 - On track, contract has been signed with the new payroll provider and implementation is underway leading to planned go live in November 2016
5	We were informed during our audit that HR Advisors, the HR Manager and Head of HR Operations review payslips for all employees who have had a change in the payroll Masterfile data to ensure that payroll calculations appear accurate. However, this review is not currently being documented by HR and we were therefore unable to evidence that these reviews were occurring as part of our audit. Furthermore, our sample testing of new starters identified that a New Starter Form (available on Lotus Notes) had not been completed for one out of ten employees sampled. This employee had previously been a temporary employee and had changed into a permanent position. However, a New Starter Form should have been completed when they commenced permanent employment. Without regular reviews of payroll processing by HR, there is a risk that HCPC may not make accurate payroll payments to employees.	HR should commence documenting the payroll reviews they perform and retain these reviews for audit trail purposes. The Head of HR Operations should remind the HCPC Managers of the importance of completing New Starter Forms for all new starters, including where individuals move from temporary to permanent employment.	Low	Currently the HR Co-ordinator checks the payslips against the changes and the HR Manager/ Head of HR Ops reviews any errors identified with the HR Co-ordinator. The Quality Monitoring Sheet is used to capture any issues/ errors which have been identified by HR and Finance during the checking process each month. An email is also sent by the HR Coordinator responsible for that month's payroll to Finance when the check reports have been checked and HR are happy that no further changes need to be made. Under the new payroll system, we will produce a monthly checklist and will ask the preparing and reviewer to both sign the checklist physically or electronically to show that review has been done. The incident where a new starter form was not completed was a one off. The employee in question was firstly a temp, then employed in a permanent position in a different department, and then transferred to another permanent role in the original department.	Head of Financial Accounting/ Human Resources Manager **Update** 06/03/17 – Integrated payroll and HR system went live in December. We have now run 3 payrolls and are reviewing the process checking and sign off process. Integrated HR and payroll system mean that non-completion of new starter form is no longer an issue. **Previous updates** 22/11/2016 – go live is now planned for December following a

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
				Upon moving back to this role, a new starter form was not completed. HR department would normally make sure new starter forms are filled out for all employees. Date Effective: Nov/Dec 2016 (Implementation of new payroll bureau system) *Owner:* HR department	parallel run in November 06/09/2016 - On track, contract has been signed with the new payroll provider and implementation is underway leading to planned go live in November 2016
	Payroll HCPC's outsourced payroll provider (Access) have developed procedural documentation for the payroll activities they complete on behalf of HCPC. At the time of our audit this procedural documentation had recently been updated and had yet to be reviewed by HCPC to ensure that changes appear appropriate. In our experience, changes to procedure documentation (particularly that of third party service providers) must be reviewed and agreed upon in a timely manner as changes to processes may weaken the control environment and could lead to payroll processing errors. Furthermore, the current internal process flow documentation maintained by HCPC does not cover all payroll activities performed by HR and Finance teams. For example, this does not detail the nature of checks performed by HR and Finance over payroll before this is processed by Access. Without up-to-date and comprehensive guidance material, there is a risk that a change in	The HCPC HR and Finance teams should review recent amendments to Access's payroll procedural documentation to ensure that these appear reasonable, and feedback any changes they feel should be made to ensure a robust control environment is in place. The HCPC HR and Finance teams should provide formal approval for all amendments required by Access to their procedural documentation going forward. The HCPC HR and Finance teams should expand the current payroll flow documentation to cover all key payroll processing activities. Additionally, this procedural	Low	A new detailed process note for payroll will be produced as part of the new payroll and HR system. We will ensure that if CoreHR propose a change to the procedures in the future, this will get sign offs from HCPC first. The only amendment to Access's payroll procedures was the change to the calculation for mid-month salary increase. This is updated in the payroll procedures manual and have now been reviewed by HCPC. We will look to update the process notes for partner payments once FTP has been transferred to this process and checklist/sign off sheet has been agreed with all departments. Date Effective: · Payroll: Nov/Dec 2016 (Implementation of new payroll bureau system) · Payment process – Q2/3 2016 Owner: Finance department	Head of Financial Accounting/ Human Resources Manager **Update** 06/03/2017 – on track, a new payroll process flow for employees is due to be completed shortly **Previous updates** 22/11/2016 – go live is now planned for December following a parallel run in November 06/09/2016 - On track, contract has been signed with the new payroll provider and implementation is underway leading to planned go live in

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
	staff involved in payroll processing may lead to key activities not being performed efficiency or key controls within the payroll process not being adhered to. Partner Payments The current partner payment process flow documentation maintained by HCPC does not cover all partner payment activities performed by Finance and relevant Departments. For example, it does not currently include how to input partner payments into WAP, and how Departments should maintain their own records of partner work completed. Without up-to-date and comprehensive guidance material, there is a risk that a change in staff involved in processing partner payments may lead to key activities not being performed efficiency or key controls within the partner payment process not being adhered to.	guidance should be updated to reflect changes in processes due to movement to the new outsourced payroll provider. The HCPC Finance team, and other relevant Departments across the organisation involved in partner payments, should expand the current partner payment flow documentation to cover all key activities in this area.			November 2016

Review of Whistleblowing arrangements (report dated August 2016 – considered at Audit Committee 6 September 2016)

Recommendations summary

Priority	Number of recommendations
High	None
Medium	2
Low	1

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
1	Since becoming a prescribed person in October 2014, the Council at its meeting in March 2015 considered the Francis Report on Freedom to Speak Up and made a number of commitments to be completed within agreed timescales. One of these was to continue work in 2015/16 on developing an organisation-wide process for identifying, recording and handling protected disclosures made to the HCPC as a prescribed person under PIDA. The Director of Policy and Standards informed us that management had recently published more detailed information on its website about making such disclosures (as part of an existing section for registrants on reporting and escalating concerns). An internal policy setting out what is means to be a prescribed person and what procedures need to be followed had not yet been produced, but is planned for autumn 2016. The Council should use the launch of this policy to promote the role of the HCPC as a prescribed person to managers and staff and to brief and/or train as appropriate those who might receive such disclosures. There may not be clarity within the HCPC in how to deal with disclosures to it as a prescribed person without a policy.	The Council should ensure that a Prescribed Persons Policy is developed, approved and introduced within an agreed timescale and monitored. All employees, partners and Council and committee members should be made aware of the new policy so that the HCPC's role as a prescribed person is clear and understood.	Medium	Recent discussion with the Solicitor to Council has confirmed that we are compliant with the legal expectations placed on us as a prescribed person. We agree, however, that an internal policy which can be used to raise awareness across the organisation of our role as a prescribed person would be very helpful. A policy will be produced and agreed by the Executive Management Team in 2016, with progress reported in the Policy and Standards Directorate report to Council.	Director of Policy and Standards **Update** 15/03/2017 - This work is now expected to be considered by the EMT in March 2017 **Previous updates** 22/11/2016 – This is underdevelopment and is due to be considered by the Executive Management Team in January 2017.

Non-Case Preparation and Presentation Legal Services Cost Management (report dated November 2016 – considered at Audit Committee 22 November 2016)

Recommendations summary

Priority	Number of recommendations
High	None
Medium	None
Low	2

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
1	As part of the audit, we received a copy of the email in which the Finance Director communicated the new process for commissioning, approving and budgeting for legal services provided by external lawyers to Executive Management and to Bircham Dyson Bell. We found the process to be very clear and well defined and in line with processes in operation at other similar organisations. We noted that the HCPC currently has process maps and formal process documentation saved on the staff intranet in respect of key activities. However, we noted that the new process has not been formally documented and added to the intranet alongside other key processes. Without formal documentation of the process, there is a risk that staff may be unclear about the new process and may operate it inconsistently.	We recommend that the process for commissioning non case preparation and presentation legal work is formalised and placed on the staff intranet so that relevant staff members can quickly and easily refer to it.	Low	Agreed. There is guidance on raising purchase orders but it focuses on the steps necessary to generate purchase orders from the system, rather than the required content of the purchase order and the communication with the supplier. The guidance will be reviewed and updated to include the process for commissioning work from BDB, and the application of similar good practice to the commissioning of work from other suppliers Date Effective: Guidance to be updated by end January 2017.	Director of Finance **Update** 15/03/2017 – Cleared. The guidance has been updated
2	As part of our fieldwork, we completed testing on a sample of 20 purchase orders raised since the introduction of the new process in April 2016. We noted the following exceptions as part of our	We recommend that the HCPC consider the possibility of checks to	Low	The risk of a user circumventing the authorisation limits by raising separate purchase orders for the	Director of Finance **Update**

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
	testing: • One instance where a purchase order was raised after the invoice date. • One instance where an invoice was received and subsequently matched against two purchase orders, for £13,444 and £26,928. Both purchase orders were for the same expenditure and therefore should have been in one purchase order. In both instances, the expenditure was valid and had been approved correctly by the relevant delegated authority. In the second example, as the value of the second purchase order exceeded the threshold for approval at £25,000 and the total value of both purchase orders did not exceed £50,000 (therefore falling between the level 3 limit for approval between £25,000 and £50,000) the purchase order went through the appropriate approval process. However, there is a risk that two purchase orders raised for £15,000, totalling £30,000 would bypass the control requiring further approval for purchases over £25,000. After discussion with the Director of Finance, we understand that there is no specific report run to identify instances such as these, resulting in a risk of unapproved purchases being made.	identify retrospective purchase orders and instances where there may be multiple purchase orders for the same legal advice. Additionally, we recommend that staff are reminded of the requirement for purchase orders to be raised before commissioning work, thus preventing retrospective purchase orders being raised.		same piece of work is understood, but the system does not provide an automated way of checking for instances of this and we do not think it is necessary to introduce a new manual process to check against it. Other controls exist: all POs need to be approved by at least one other user other than the preparer, and budgetary controls and review of management accounts should identify material overspends. In the revised guidance (per response to recommendation 1) we will reiterate that each piece of work should be covered by a single purchase order and the value of that PO increased if necessary. The guidance will also reiterate the requirement for purchase orders to be raised before work starts. Date Effective: Guidance to be updated by end January 2017.	15/03/2017 – Cleared. This point is covered in the updated guidance

Review of Partner Recruitment (report dated November 2016 – considered at Audit Committee 22 November 2016)

Recommendations summary

Priority	Number of recommendations
High	None
Medium	1
Low	2

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
1	As part of our review we randomly selected the May 2016 recruitment campaign for Social Worker Panel members for testing. Applications were received from 33 candidates for the nine positions on offer. Whilst we identified mainly a high level of compliance with the approved procedures, as detailed in Section 1 of this report, there were a couple of errors: - Candidate X had advised on his application that he was an atheist, however this was entered incorrectly on the HR system. (This was amended by the Partner Co-ordinator during the audit). - Candidates X and X references had not been signed as being reviewed by the Partner Manager, in accordance with the agreed procedures. We were advised that this was due to an oversight. (We have advised the Partner Manager to ensure that all references are reviewed and signed as evidenced prior to acceptance.) - a UK passport had expired in 2014, however, this is still acceptable as right to work in the UK under Home Office rules. Without checks on data inputting to the system or for compliance with procedures, errors may remain undetected and undermine confidence in records.	We recommend that the Partner Manager undertakes regular self audits to ensure compliance with agreed policies. HCPC to consider whether there is potential to introduce system based functionality to flag dates where right to work in the UK is expiring.	Medium	Current recruitment processes are extremely labour intensive and paperbased due to the limitations of the current HR system. Some input errors are inevitable. A new Partner information system is due to go live in 2017 which will address this issue as there will be less duplication of data entry. From 2017, the Partner Manager will carry out an audit of agreed policies once a quarter to ensure compliance. The new partner system will also include functionality to flag when right to work in the UK is expiring Partner Manager by June 2017	Partner Manager **Update** 15/03/2017 – complete - the first process audit is scheduled to take place in June 2017. The new partner system is due to go live in June 2017 and includes functionality to flag when right to work in the UK is expiring.
2	There is currently no requirement for recruitment campaigns to be designed to recruit Partners which represent the demographic of the registrants. This includes ethnicity, diversity and geographical location (Northern Ireland, Wales and Scotland).	The Partner Manager and Partner Coordinator should identify the demographic of the	Low	This action will be carried out, but it is only possible to do so for age, gender and geographical location. Data for other categories is not	Partner Manager **Update** 15/03/2017 -

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
	We were advised that approximately three years ago a targeted campaign was made in ethnically diverse publications, however this was deemed to be unsuccessful due to a lack of applicants from the advertisements placed. Given the emerging plans for analysing equality and diversity data we consider that this should now be reviewed to fully inform the process, publications and plans for future Partner recruitment campaigns. Failure to recruit Partners from a diverse range of backgrounds may lead the HCPC not achieving its equality and diversity objectives.	registrants and use this information to help inform future recruitment campaigns. Local press in Northern Ireland, Scotland and Wales should also be explored for future campaigns.		currently held by the HCPC, or by any other body. The new Registration system will have the potential to capture more detailed registrant demographic data. Use of local press will be considered where appropriate Partner Manager by March 2017	complete – an analysis of the available demographic groups is carried out before each recruitment campaign and action taken as appropriate.

Review of Registration Appeals Process (report dated November 2016 – considered at Audit Committee 22 November 2016)

Recommendations summary

Priority	Number of recommendations
High	None
Medium	1
Low	2

	Finding and Implication	Recommendation	Priority	Management response	Timescale/ Responsibility
1	Current practice states that Appeal Panel chairs must also be a Council member. There is no separate role profile for Panel Chairs. It is undertaken as part of their Council member role. The Panel Chairs we spoke to stated that it would be beneficial to develop a specific role profile clearly outlining the role and responsibilities. The Panel Chairs also stated that further training on the role would support the process. This could include training on the roles and responsibilities of all involved in the appeals process and some simulated experiences of dealing with potentially difficult/aggressive appellants. Failure to provided clarity on the role, with associated training, may lead to inconsistent practices.	The HCPC should develop a specific role profile for the Registration Appeals Panel Chair. This should be supplemented with refresher training including simulated experiences of managing difficult appellants.	Low	A specific role profile will be created for the Panel Chairs and implemented on or before the 21 November 2016. The content of refresher training will be reviewed and any enhancements will be included within the refresher training scheduled for 2017.	Registrations Appeals Manager **Update** 15/03/2017 - Discussions with FTP are in progress to enable us to see what we can emulate and what they have in place for new Panel Chair training/refresher training. These changes once identified will be included in the refresher training that will be delivered in 2017