
Operational Risk Register Annual Review

Executive Summary

The Operational Risk Register (ORR) review is provided to the Audit and Risk Assurance Committee (ARAC) once a year around autumn. This review documents the changes in risks faced by different parts of the HCPC over the year, and any broad changes to levels of inherent or residual risk that have a bearing on the organisation. Not all risks are documented in the review paper.

An extract of the latest version of the Operational Risk Register setting out the risks discussed in this paper is attached. This uses the single tab for all operational risks, as this allows selection and sortation across the whole organisation. The first column in the 'Combined Op Risks' tab includes the departmental designation as used in the 'Title & Contents' tab. A copy of the latest iteration of the full ORR has been shared separately with Committee members.

Previous consideration	This report was reviewed by the Executive Leadership Team (ELT) on 10 September 2024. The ELT see extracts from the Operational Risk Register on a regular basis and discuss departmental risks on a periodic basis.
Decision	The Committee is asked to note the report.
Next steps	Quarterly updates with operational risk owners will continue with rapid escalation to the ELT if unexpected changes are located.
Strategic priority	The operational risks are relevant to all aspects of the Corporate Strategy 2021-26.
Financial and resource implications	Not applicable
EDI impact and Welsh Language standards	None anticipated
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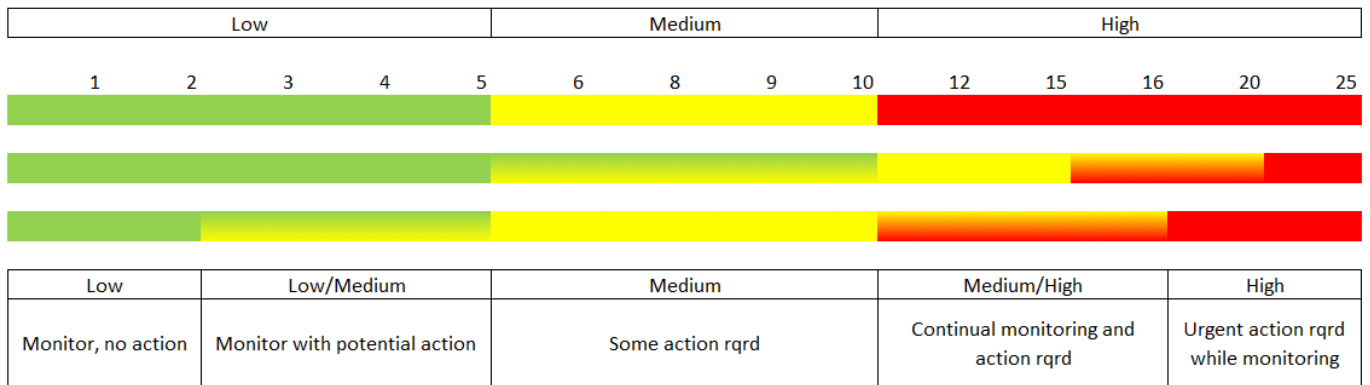
Annual Review of the Operational Risk Register

1 Introduction

- 1.1 The Operational Risk Register (ORR) is updated quarterly via meetings with risk owners across the organisation. Often these updates provide incremental changes to inherent or residual risk levels reflecting changes in resources, or the completion of projects that deliver new capabilities.
- 1.2 Some departments occasionally completely review their risks and start again from scratch. This has occurred with the Education department and Business Change and Projects have added several new risks whilst reevaluating existing risks.
- 1.3 Other departments take a more iterative ongoing approach.
- 1.4 To aid use of the Operational Risk Register the 'department by tab' approach has been changed to a single tab approach, enabling across the organisation profiling to be carried out.
- 1.5 A pdf version of the operational risks discussed in this report is attached. The full risk register has also been provided to Committee members.

2 Risk Scoring

2.1 Levels of risk currently use the following matrix of scores:



Catastrophic	5	10	15	20	25
Significant	4	8	12	16	20
Moderate	3	6	9	12	15
Minor	2	4	6	8	10
Insignificant	1	2	3	4	5
	Highly Unlikely	Unlikely	Possible	Likely	Highly Likely

3 High level influences on the Operational Risk Register

3.1 This report covers the period August 2023 to August 2024.

3.2 Following the changes to the ELT in the report period covered last year, the ELT has seen little change in personnel. One member is currently on maternity leave, but responsibilities have been shared across remaining ELT members. All of the management team are experienced working with the Council and Committees. A fee rise has been undertaken and future fee rises are being planned to ensure a stable financial future. The organisation is not rich in funds but looks to be more sustainable in the short to medium term.

3.3 Regulatory reform seems to have progressed little over the last year, but there are potential concerns around the cost and speed of implementation required.

Department - August 2023 - August 2024	Low 1-2	Low/ Medium 3-5	Medium 6-10	Medium / High 11-15	High 16-25
Corporate Affairs					
Information Governance & Security	0 - 0	3 - 2	6 - 8	0 - 3	0 - 0
Complaints	0 - 0	0 - 0	0 - 0	0 - 0	0 - 1
Quality Assurance	0 - 0	1 - 0	3 - 4	0 - 2	0 - 0
Governance	0 - 0	1 - 0	7 - 7	0 - 0	0 - 0
Partners	0	0	5	1	2
Communication	0	1	8	0	0 - 0
Strategic Relationships	0	1	4	0	0 - 0
Professionalism, and Upstream Regulation	0	1	0	0	1
Education, Registration and Regulatory Standards					
Education	0	7	7	0	0 - 0
Insight and Analytics	0	0	2	1	0 - 0
Policy and Standards	0	1	5	2	0 - 0
Registration & CPD	0	1	3	5	1
Fitness to Practise & Tribunal Service					
Fitness to Practise	0	0	6	2	1
Resources					
Estates & Facilities	0	2	6	0	0 - 0
Finance & Procurement	1	5	4	1	0 - 0
Information Technology	0	0	6	1	0 - 0
Human Resources	0	2	5	0	0 - 0
Business Change	3	5	6	0	0 - 0
Executive Leadership Team	0	1	7	4	0 - 0
TOTAL RISKS	5 - 4	31 - 27	88 - 85	20 - 22	0 - 6

3.4 Overall the number of operational risks is the same as at the start of the reporting period, but there has been a slight shift from the lowest risk scores (under ten) to the medium or higher scores.

3.5 As the organisation has matured, there is more acceptance by risk owners of high scoring risks due to the nature of the risk and the potential impact on the organisation, as opposed to any great change in risk profile.

3.6 The graphic illustrates the same number of risks, but some risks are new, and others have been removed:

	Low 1-2	Low/ Medium 3-5	Medium 6-10	Medium / High 11-15	High 16-25	Total Risks
Total Risks 2023	5	31	88	20	0	144
Total Risks 2024	4	27	85	22	6	144

3.7 Not all risks are referred to within this annual review, but key changes to how some risks are addressed have been picked out.

3.8 Where individual risks are quoted, the risk number is quoted in the first part of the of the square brackets, the current inherent risk is quoted next after the ‘;’ and the current residual risk is quoted after the ‘/’. Example [REG9; IR12/RR6] = Registration risk number 9, Inherent Risk = 12, Post Mitigation (Residual) Risk = 6.

4 Directorate risk overview: Corporate Affairs

Information Governance and Security

- 4.1 The migration of our information security certification [ICS7; IR9/RR6] was successfully completed in April 2024 and well before the ISO deadline of October 2025. Documentation and processes have been updated to maintain certification over the next five years, although some minor tweaking is likely over time.
- 4.2 Failure to adhere to operational policies or information security policies [ICS1; IR16/RR9] continues to bring a background level of information security incidents and potential technological solutions are being evaluated.
- 4.3 The implementation of some additional security engineering has proved to be beyond the capabilities of some of our existing contractor organisations [ICS11; IR20/RR15] requiring internal development of expertise. The growth and availability of artificial intelligence (AI) threatens the use of CAPTCHA technologies in the short to medium term, which will need to be addressed in the near future.
- 4.4 The ongoing migration from ‘on prem’ to cloud-based services and storage continues to mitigate against many physical DR scenarios [ICS12; IR20/RR12] although this does put all of our eggs in the cloud ‘basket’, like the majority of other organisations.
- 4.5 The use of freedom of information (FOI) requests and subject access requests (SARs) in a disruptive manner [GOV7; IR9/RR6] has continued and may become more widespread, which could impact resource requirements.

Assurance and Compliance

- 4.6 The concentration on remedial work (QA1/57) has seen an increase in pre-mitigation Failure to identify significant trends in feedback/service complaints [QA5; IR16/RR12] has increased from IR12/RR8 over the year, due to the difficulty in recording appropriate categorisations for feedback in the database and analysis. An upgrade is being planned for, but we need to avoid minimum viable project as resources for potential upgrades or changes may not be forthcoming. [QA6;

IR16/RR16] Organisational failure to respond to significant trends in feedback/ service complaints, and [QA7; IR12/RR12] Insufficiently robust feedback data flow

- 4.7 [QA3; IR12/RR9] Focus on traditional areas of failure distracts from new areas of risk, and [QA4; IR16/RR9] No capacity for additional scope both highlight the potential impact of resources to locate operational issues before they have an increased impact on the organisation or service users. Inherent risk has been increased for both over the year.

Governance

- 4.8 Since the new Head of Governance and Business Manager for the Chair and Chief Executive Office have become fully established, [Gov8; IR16/RR9] removing this risk, existing resources have generally been released to their new tasks, [GOV9;] without issue. Further work may be required to iron out boundaries between responsibilities and cover for the areas [GOV10; IR9/RR6].
- 4.9 The Code of Corporate Governance is being reviewed this year [GOV1; IR12/RR6] although responsibilities have already been actioned to meet requirements. Non-adherence to the Code of Corporate Governance [GOV5; IR15/RR9] will also be addressed by this review.
- 4.10 Council Effectiveness [GOV3; IR16/RR9] will be improved with a modified generic cover sheet that transfers through internal approval to Committees or Council.

Partners

- 4.11 Following completion of the Nursing and Midwifery Council (NMC) versus Somerville case [PTNR1; IR20/RR16, PTNR2; IR20/RR16] increased financial commitments and changes to contracts will be made. Historic work that falls into the timescale applicable for reimbursement must be allowed for.
- 4.12 The costs of the new partner contracts may still represent poor value for money [PTNR8; IR16/RR12], whilst the additional processing of payroll, pension and ancillary processes will increase the burden [PTNR7; IR12/RR9]. The quality of decisions made by partners [PTNR5; IR12/RR8] will be supported by improved requirements for recording the basis for decisions in regulatory activities.
- 4.13 Partner diversity will be examined over the next few years, [PTNR6; IR9/RR6] although efforts to attract a more diverse range of partners are already being considered by the Partner team. Partner training [PTNR3; IR12/RR9], retention and recruitment [PTNR4; IR9/RR6] responsibilities and now shared more widely with the teams that use partners. Partners not completing the required mandatory training have their contract terminated following reminders and warnings.

Communications

- 4.14 No Head of Department was in place at start of the report period. Some of the processes for external communication were outsourced to an agency, although it was noted that they did not always have the same level of understanding of regulation as internal resources. General resourcing concerns have now been addressed [COM2; IR9/RR6] although more could be achieved with greater resource.
- 4.15 The creation of a Communications strategy was planned to be undertaken when a Head of Department was in place. A Relationship Management Chair and Chief Executive Team has been created to ease the flow of information through the organisation [COM5; IR9/RR6]. Communications are now taking a business partnering approach, which may support mitigations are improved by greater consistency in approach.
- 4.16 Organisation-wide templates are currently being monitored to lower the risk of mistakes and assist with tone of voice, although these are now departmental projects generally, propagated out from the ELT.
- 4.17 The accessibility of digital services offered by the HCPC are under constant attack and need to be protected, but also be kept sufficiently easy to use by stakeholders. [COM3; IR9/RR9] also looks at making our service more mobile friendly.
- 4.18 Aging intranet software (Flex) [COM7; IR20/RR6] that was going out of support would require replacement was recorded at the start of the reporting period at a residual risk of 12. Communications worked with IT to test and implement a solution based of generic Microsoft products that we already have access to and are now much more capable of delivering the required type of solution, avoiding bespoke software. This solution was rolled out to the organisation at the start of the summer and the intranet has a much more modern look and feel.

Strategic Relations

- 4.19 Poor professional body relationships with the HCPC may impact the trust of the regulator by registrants or other stakeholders. [SR2; IR16/RR9] reflects ongoing work to engage with more professions' professional bodies (11 out of 15 professions covered), of particular benefit for fee change discussions or other wide-ranging activities.
- 4.20 One new risk added in this area, that the 'potential impact of the General Medical Council (GMC) and NMC issues on the HCPC may cause collateral damage' [SR1; IR4/RR4], reflects the potential and in part realised challenge of HCPC decisions when other (health?) regulators are in the news for negative reasons.

Professionalism and Upstream Regulation

- 4.21 The difficulty of guaranteeing all incoming intelligence or information is passed to the appropriate operational area or just the Senior Leadership Group for action, 'Lack of established process for the recording and sharing of information and intelligence and

prompting an appropriate response from the organisation' [PUSR2; IR16/RR16] highlights the difficulty is ensuring comments or informal feedback are collated and used effectively. Failure to respond could result in damage to our reputation or failure of public protection. There is a need to ensure the recipient areas of the organisation can interpret and react appropriately. The residual risk matches inherent risk until we can find a way of testing this.

4.22 Incorrect articulation of standards for stakeholders results in incorrect interpretation by registrants, [PUSR1; IR9/RR4] will be tested as the update Standards of conduct, performance and ethics came into force on 1 September 2024.

5 Directorate Risk Overview: Education, Regulation and Regulatory Standards

Education

- 5.1 The Education department substantially rewrote their operational risks in summer 2023 and were available in the review in September 2023. [EDU-3; IR9/RR6] 'Team resourcing leads to inability to deliver assessments to time and/or quality' was previously [IR12/RR9] as succession planning and regional engagement measure are complete and other measures are ongoing.
- 5.2 'Good performance against KPIs is not sustained long term' [EDU-7; IR12/RR6] reflects concerns that improvements achieved over recent years cannot be maintained. Inherent risk last year was 9 and residual risk was 6, indicating the belief that the likelihood of crystallisation of that risk has increased whilst still under control after mitigations.
- 5.3 Partner fee levels and availability [EDU-13; IR9RR6] may be about to change following the apparent conclusion of the NMC versus Somerville case. Visitors have been hard to recruit recently.
- 5.4 EDU-14; IR6/RR4] 'Education team involvement in the standards of education and training (SETs) review does not facilitate a good review of the standards' has been completed with a successful update delivered to stakeholders.

Registration and CPD

- 5.5 Public protection [REG2; IR16/RR12] reflects the difficulty in determining if the information supplied in application, readmission or CPD processes is true at the time of submission. Inherent likelihood was increased pre-mitigation.
- 5.6 Whilst externally-facing IT systems were under continuous attack over much of the reporting period, [REG3; IR16/RR9] System Failure was considered more possible, or delays to planned functionality upgrades as resources were focused on combatting attacks.
- 5.7 Sustainability of Current Working Practices – employee availability [REG6; IR16/RR16, previously 12] reflects the roll out of the new operating model in

Registrations, with changes to teams and reporting lines. When all recruitment has taken place residual risk is likely to fall.

- 5.8 Experience, skills and knowledge of workforce and process documentation and guidance does not match current requirement of business or match stakeholder expectations resulting in missed opportunities and KPIs [REG14; IR16/RR12 but had been 8]. As the new operating model is rolled out, some vacancies still exist and the new roles require a level of training on new activities.
- 5.9 'Registration partners make incorrect, or unsupportable recommendations without internal challenge' [REG15; IR12/RR12] is being addressed by enhanced checking of decisions. This includes the new registration office role checking acceptances as well as rejections in existing processes and improved recording of how decisions are supported in documentation.

Insight and Analytics

- 5.10 Risks are targeted around the quality of existing data in systems, consistency and accuracy [I&A1; IR12/RR6] and the future consistency and accuracy of current and future data, if robust validation mechanisms are not in place within existing IT systems [I&A3; IR15/RR9]. Categorisation mechanisms are not in place that reflect the required process outputs and these may be difficult to rectify retrospectively without either significant effort or expenditure. The required changes are in the backlog, where there is a backlog of items to rectify.

Policy and Standards

- 5.11 The projected regulatory reform requirements [POL1; IR15/RR15] will require additional resource when commenced, but existing resource will engage in the process whilst awaiting the go-ahead from the Department of Health (England), however the exact requirements of regulatory reform are still not specified.
- 5.12 'Equality, diversity and inclusion (EDI) data collection to meet Professional Standards Authority (PSA) standards' [POL2; IR16/RR6] is now in its second phase after collecting data from all existing profession groups by 2023, although analysis and comparison against Fitness to Practise (FTP) data is still problematic. EDI data requirements [POL5; IR16/RR12] are typically considered early in project work, with a Strategic Lead for EDI in place, along with data protection issues considered by the Data Protection Officer (DPO).
- 5.13 Corporate memory [POL4; IR9/RR6] has been addressed to some level now that a central repository of documentation has been located. The historic archive will need to be maintained with legal advice over time.
- 5.14 Evidence of English Language ability [POL7; IR16/RR9] has been considered by the Council and deemed an appropriate update to requirements, with a maintained list of countries where English is sufficient for registration purposes, plus enhanced testing options, although the level of English required has not increased.

5.15 The Welsh Language Scheme (WLS) [POL8; IR9/RR6] deadline (December 2023) has been extended for the automated telephone messaging and online registration portal, allowing additional time to meet compliance. Future changes to processes and systems will need to incorporate WLS requirements early on to ensure ongoing compliance.

6 Directorate Risk Overview: Fitness to Practise and Tribunal Service

6.1 FTP process inefficiencies [FTP1; IR9/RR9] and FTP improvement project failure [FTP2; IR16/RR12] focus on the existing processes and the attempts to improve them, with automation ongoing but not yet completed. This in turn potentially will support risk FTP5.

6.2 Workload Impact [FTP5; IR12/RR12] focuses on the level of employees to manage the backlog and incoming case levels to ensure the backlog does not grow. Increased management is in place and a rolling recruitment process is in place to ensure minimum levels of cover are maintained. Two new head roles have been recruited to and frontloading will speed up cases in the future. Automation may speed up some areas.

6.3 The quality of partner decisions [FTP8; IR8/RR8] and recorded reasons for those decisions, or failure to reach decisions [FTP7; IR15/RR9] remain an area of concern.

6.4 One of the new risks [FTP12] includes the reliability and evidential weight given to non-UK case material in HCPC cases. Impact and likelihood, pre and post mitigation and mitigations are yet to be determined.

6.5 The risk of suppliers failing to adequately manage outsourced cases [FTP13; IR15/RR10] has been realised historically. Measures to ensure this is much lowered as an operational risk are being addressed.

7 Directorate Risk Overview: Resources

Estates and Facilities

7.1 As inflation has fallen over the last year and world energy prices have become more stable, 'Inflationary pressures on cost of office operation' [OFS7; IR9/RR6] has fallen from IR16/RR16.

7.2 Whilst no significant changes have occurred around 'Non-compliance to Fire Safety Regulations' [OFS1; IR10/RR4] the inherent risk was increased from 4, following a re-evaluation of the likelihood and potential impact.

7.3 Building plant end of life [OFS2; IR12/RR6] inherent risk remains the same overall, but the impact is estimated to be up and likelihood to be slightly down remaining at 12 overall reflecting better control of the likelihood of significant failure, with more pre-emptive work in this area.

7.4 Environmental compliance [OFS8; IR16/RR9] is potentially difficult as much of what is under HCPC control has already been addressed, including switching to

renewable electricity and planned change from gas to electricity where usage still occurs, but our suppliers across all business areas may be in turn dependent on their own third-party suppliers making overall evaluation difficult. The use of AI in our business processes will increase energy usage. Government requirements are under evaluation and International Organisation for Standardisation (ISO) standards are being evaluated as a mechanism to ensure we can meet compliancy targets.

- 7.5 'Inability to process post' [OFS4; IR12/RR8] reflects a decreasing volume of post into and out of the buildings, but the increased potential for time-sensitive items not reaching their target recipients in time for appropriate action. Flexible working following the pandemic possibly increases the likelihood of items being missed if content is not reviewed within departments in time.

Finance and Procurement

- 7.6 The re-implementation of Business Central (BC) integrated with the workflows associated with income collection from existing or applying registrants and applicants [FIN1; IR25/RR12] has been completed. Outputs are being monitored and phase 2 designed for the calculation of deferred income. The Sage financial package has been replaced and decommissioned. Documentation [FIN2; IR25/RR2] for the BC based systems is generally downloadable from Microsoft resources, minimising the amount of bespoke documentation required. The BC specialist is creating workflow documentation. Finance reporting risks [FIN9; IR16/RR4] will be lowered when the full BC migration and additional deferred income calculation are available.
- 7.7 Managing two sets of auditors [FIN10; IR12/RR4] was flagged as a potential impact on workload, with potential different ways of working and possible conflicts to resolve. This risk has been resolved as the NAO must be used for public sector organisations, whilst the additional auditor is not a statutory requirement. A small cost saving is also likely. Pre-mitigation risk was 12, post-mitigation risk was 4.
- 7.8 Resourcing within Finance [FIN3; IR15/RR6] includes the recruitment of a Payroll Officer to support in insourcing of the payroll process. Insourcing of the payroll process has been completed over the year, [FIN7; IR12/RR6] with the additional finance resource in place plus potential backup from the HR department if required.

Information Technology

- 7.9 An updated IT strategy has been published, which will favour a more consolidated platform-based approach using common database technologies.
- 7.10 Cyber attacks have continued over the year [IT7; IR16/RR8] with a brief respite in the first part of the current financial year. New approaches to securing the public facing parts of the infrastructure have been undertaken, although the IT department have had to create implementation solutions where suppliers were unable to assist us. More robust defences may have an impact on stakeholder usability, so a balance

is required between ease of use and security. One option under consideration is the use of multi-factor authentication on all web services.

- 7.11 'Employee or contractor-based information loss' [IT6; IR12/RR9] will be addressed through the implementation of E5 Data Loss Prevention, with careful navigation of potential impacts on current business processes. The software upgrade has been delayed by work on other delayed projects, limiting availability of resource. A substantial amount of investigation on potential impacts on the regulatory areas is required to safely implement the security features without slowing existing ways of working.
- 7.12 The first part of the BC re-implementation has been completed, replacing the Sage financial package with some time delays, resulting in other IT based projects being delayed. Risk [IT4; IR15/RR6] has been addressed partially by the removal of 'on prem' Sage, which would be difficult to manage in a totally remote working environment.
- 7.13 The structure of the department is being examined to improve resilience, skills and capacity [IT5; IR20/RR16] with temporary resources being replaced by a different resource, if proposals are accepted. This will help address IT7 above.
- 7.14 The on-site financial system Sage is now out of use as the first part of the BC project has delivered. The information and processing is now cloud based [IT4; IR15/RR6], making IT disaster recovery and resilience arrangements to not work as expected less likely.

Human Resources

- 7.15 'The inability to recruit quality candidates' [HRD1; IR12/RR6] has been reduced following introduction of the new recruitment portal over the last year with a simplified CV and cover letter approach, growing the response rate for 20-30 to 200 applications per role.
- 7.16 Apprenticeships and internal development programmes along with succession planning will address turnover (10%) and retention [HRD2; IR12/RR9] over time, along with the conversion of temporary to permanent contracts.
- 7.17 'Employee morale' [HRD4; IR12/RR4] is currently at the target level, with ongoing survey based monitoring, although not all employees complete the surveys on a regular basis. Office has been reconfigured to allow optimum use by those on site.
- 7.18 Payroll processing has been insourced over the past year, using the existing technology with a second person recruited to allow resilience in the process within the Finance department. This partially mitigates [HRD5.; IR16/RR8].
- 7.19 Changes to the Border Agency requirements for sponsorship of roles [HRD7; IR9/RR5] to higher level salaries positions has lowered the chance of large numbers of sponsored employees in low salary positions incurring additional costs.

Business Change

- 7.20 More robust budget planning is in place [PBC1; IR4/RR4] following the development of the process for financing and tracking expenditure across individual projects. Benefits are tracked at the project level.
- 7.21 'Department resourcing limitations' [PBC2; IR3/RR3] is now complete, with a project manager for each of the major projects and support in the Projects office. Upskilling is now underway.
- 7.22 'Lack of an integrated financial system' [PBC3; IR2/RR2] has now been completely resolved, and monthly reporting is shared allowing progress to be tracked in detail.
- 7.23 'Poor change management' [PCB9; IR8/RR4] has reduced the likelihood of events through the use of the Change and Benefits Forum and standardisation of processes, with the BC project used as a test of the new process. No further changes are envisioned at present.
- 7.24 The support contract for our IBM developed products was due to expire in January 2024 and negotiations proceeded slowly due to the negotiation around price rises. [PCB11; IR15/RR10] and IR had risen from 10 in the early part of the year. Business Central is now supported by a different supplier. All parties working together may take time to embed fully.
- 7.25 'Poor third party support [PBC16; IR6/RR4] affecting performance and backlogs of enhancements or fixes for existing IT systems in key areas, Education, FTP, Registration' is being addressed through more robust control, with the principle of they work for us – we don't work for them.

8 Executive Leadership Team

- 8.1 With a permanent Chief Executive in place for over a year and a modified ELT structure and changed responsibilities, ELT is more visible to the organisation. ELT Capacity and succession planning [ELT6; IR8/RR4] has improved from IR16/RR6, as all ELT positions have been filled and been reorganised, SLT positions are also complete. [ELT8; IR12/RR9] is also around succession planning but includes failure of corporate memory and process documentation and knowledge sharing.
- 8.2 Failure of sustainable funding [ELT12; IR20/RR12] refers to an ongoing requirement to ensure income grows over time to match the requirements of inflation and changes to the organisation over time. Fee rises have been sporadic over the last ten years.
- 8.3 A new risk [ELT13] has been identified around the affordability of Regulatory Reform, where the timing for a go-ahead decision and the funding are difficult to constrain.
- 8.4 Risks around Tone of Voice project failure [ELT14; IR12/RR6] has been pushed out to department level, Registration, FTP, Education to implement. This will be removed from ELT operational risks at the next iteration.

DEPT TAGS	Risk Number	Risk Category	Risk Title	Risk Description (Event - cause - consequence)	Risk Team	Risk Owner	Inherent Risk Impact	Inherent Risk Likelihood	Inherent Risk Rating	Treatment Type	Treatment Steps	Treatment Owners	Treatment Target Dates	Post mitigation Impact	Post mitigation Likelihood	Residual Risk Rating	Next Review Date	Target Risk Rating (with reasonable resources and time)	Risk Appetite	Future Mitigations
							Catastrophic = 5 Significant = 4 Moderate = 3 Minor = 2 Insignificant = 1 (Before mitigations)	Highly Likely = 5 Likely = 4 Possible = 3 Unlikely = 2 Highly Unlikely = 1 (Before mitigations)	High = 25-20 Medium/High = 19-11 Medium = 10-6 Low/Medium = 5-3 Low = 2 - 1	Mitigate Accept Avoid Transfer			Time at which treatment due to be fully functioning	Catastrophic = 5 Significant = 4 Moderate = 3 Minor = 2 Insignificant = 1	Highly Likely = 5 Likely = 4 Possible = 3 Unlikely = 2 Highly Unlikely = 1	High = 25-20 Medium/High = 19-11 Medium = 10-6 Low/Medium = 5-3 Low = 2 - 1		High = 25-20 Medium/High = 19-11 Medium = 10-6 Low/Medium = 5-3 Low = 2 - 1	Minimal Measured Open Seeks	
COMMS	23 COM2	Strategy	Communications Department Resourcing Limitations	Communications Department resourcing issues will impact communication quality and responsiveness which will mean Council and ELT requirements are not met due to the Communications Department not having the required staffing numbers or range of skills.	Communications	Executive Director of Corporate Affairs	3	3	9	Mitigate	Team engagement Still small dept, will require ongoing use of external support (Luther). Not currently recruiting. x2 vac, x2 temps short term. Head of Comms & Engagement in place. x 1 9 month contracts for internal comms mgr. Also x1 Agency role. Review of strategy will be followed by examination of how to deliver via internal or external resources.	Executive Director of Governance Assurance & Planning & Comms Team Lead	Ongoing	3	3>2	6	Aug/Sept 2024	8		Filling vacant post will lower risk in future. May be decrease in Luther funding and increase inhouse resourcing
COMMS	24 COM3	Operations	Digital Service Accessibility Issues	The rollout of the digitisation strategy for all interactions with registrants, partners and the public will impact service quality and stakeholder satisfaction due to specific stakeholder groups user experience and potentially accessibility issues. Pace of change may impact UX without procurement controls requirement for AAA compliance adhering to updated Digital Strategy.	Communications	Executive Director of Corporate Affairs	3	3	9	Mitigate	New Digital Officer post in place full-time to focus on user experience on website and supporting UX as digitisation strategy moves forward. (Currently part working on general Comms support due to ongoing resource issues). Transform customer experience, project to develop overall approach to online, for dev and roll out from 2025-6.? Website hubs in place to support good UX - registrants, employers, education providers, students. Digital best practice and optimisation of website resources, however digitisation of portal front ends to business systems is less optimized. UX principles collected at recent inhouse workshop - North Star vision. Rvw'd with ELT, principles established, testing with users next. Website accessibility rvw commencing. Registrant experience review ongoing, BAU etc included Org wide process.	Comms Team Lead Head of IT&DT;	Ongoing	3	3	9	Aug/Sept 2024	6		UX workshop held user & employees, to produce vision of what Digital access should aim for. AAA across much of web interface, AA in places. Website accessibility rvw
COMMS	26 COM5	Reputation	Immature Reputational Communications Management	Inconsistent or inappropriate organisational communications will impact the reputation of HCPC due to the processes for managing proactive, reputational communications being immature. [Excludes individual applicant/registrant communications]	Communications / Policy	Executive Director of Corporate Affairs	3	3	9	Mitigate	External Comms agency in place to manage risk, Regular and close engagement between external agency, internal comms team and policy team. Forward plan aligned to strategy and shared weekly with CEO and Chair. Relationship Mgmt CCE team. CRM system when finances allow. Engagement Management Group EMG meets monthly to cover stkhld engagement. Relationship mgmt for prof bodies, time intensive, but inconsistent results due to time pressures. New Stakeholder newsletter from Adam 4 prof bodies. New Hd of Comms & Engagement will increase maturity of offering. Skills transfer. Upskilling	Executive Director of Governance Assurance & Planning	Ongoing	3	2	6	Aug/Sept 2024	4		Org wide Tone of Voice doc to be rolled out to whole HCPC. Match in to BRAND of HCPC.
COMMS	COM7 new June21/2023		Impact of intranet software loss	Lack of development of the FLEX software solution for the organisation intranet leads to loss of functionality and potential withdrawal of software due to contractual issues. (IT held Contract ends but rolling contract offered as interim)	Communications & IT	Executive Director of Corporate Affairs	4	5	20	Mitigate	Trial use of latest Microsoft products to deliver a modern intranet. VIVA Engage. Connection (plugs into Teams) & modern SharePoint, (IT held Contract ends but rolling contract offered as interim). New supplier procured in final quarter of 2023-4 and project to commence imminently	Hd of IT & Digital & Comms	Ongoing	3	4>2	6	Aug/Sept 2024			Testing possible solutions but not in workplans for this year. (IT & Coms)

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EDU	EDU23-3	Public Protection	Team resourcing leads to inability to deliver assessments to time and / or quality	Event - We do not have sufficient internal resources to deliver operational assessment and / or crucial supporting activities (for example, regional engagement, producing / acting on insight from data) to time and / or quality Cause - Unexpected staff changes, inability to quickly fill vacancies, poor planning for expected assessment and / or supporting activities, poor engagement with the sector to identify potential spikes in activity, underinvestment in education due to internal perception of impact of education activities Consequence - Public protection and reputational – Programmes are not reviewed in time for start dates, meaning negative impact on workforce. We do not pick up issues through monitoring in a timely manner, leading to unsuitable individuals entering the Register . negative feedback leading to a loss of stakeholder confidence in our work	Education	Head of Education	3	4>3	9	Mitigate	1. Succession planning - in place 2. Regular review and understanding of expected assessment activities 3. Regional engagement Dept project 4. Line management of team to ensure case load effectively managed	1. HoE / HR 2. EMs 3. KK 4. EMs	1. Complete 2. Ongoing 3. Complete 4. Ongoing	3	3>2	6	Aug/Sept 2024	6	Measured	
EDU	EDU23-7	Public Protection	Good performance against KPIs is not sustained long term	Event - Performance against our KPIs does not sufficiently improve now we have delivered the 2021-22 academic year backlog, providing a poor stakeholder experience Cause - Team is not sufficiently skilled or resourced to deliver against KPIs. KPIs are unrealistic Consequence - Public protection and reputational – Programmes are not reviewed in time for start dates, meaning negative impact on workforce. We do not pick up issues through monitoring in a timely manner, leading to unsuitable individuals entering the Register. Stakeholder confidence in the model is undermined, along with confidence we will deliver on future commitments . The team is burned out by continued pressure, and a sense we are not able to manage the expected level of operational activity	Education	Head of Education	3	3>4	12	Mitigate	1. Succession planning 2. Regular review and understanding of expected assessment activities 3. Re-review of service levels and KPIs 4. Line management of team to ensure case load effectively managed	1. HoE / HR 2. EMs 3. HoE / EMs 4. EMs	1. Completed 2. Ongoing 3. Q3/2024 4. Ongoing	3	2	6	Aug/Sept 2024	6	Measured	
EDU	EDU-13	Public Protection	Partner fee level leads to difficulties maintaining a partner pool which enables delivery of regulatory assessments	Event - We do not have sufficient partner resource to deliver operational assessments Cause - Partner resignations and / or inability to recruit new partners due to the fee offered for work undertaken actually or perceived to be lower than market rates Consequence - Public protection and reputational – Programmes are not reviewed in time for start dates, meaning negative impact on workforce. We do not pick up issues through monitoring in a timely manner, leading to unsuitable individuals entering the Register. Negative feedback leading to a loss of stakeholder confidence in our work	Education	Head of Education	3	3	9	Mitigate	1. Central review of fees following conclusion of NMC case 2. Education review of partner work to ensure all is needed to undertake assessments 3. Review of education partner fee structure	1. Partners 2. Education 3. Education / partners	1. tbc 2. 2024-25 FY (prior to budgeting exercise) 3. 2024-25 FY (prior to budgeting exercise)	3	2	6	Aug/Sept 2024		Measured	

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EDU	EDU-14	Public Protection	Education team involvement in the standards of education and training (SETs) review does not facilitate a good review of the standards	Event - the Education team is not involved as required to develop the SETs focused on new and emerging areas, and / or to ensure they can be implemented well Cause - poor planning / engagement, including the prep for individuals Consequence - the SETs do not function as intended, and / or cannot be adopted by all education providers / programme models	Education / Policy	Head of Education / Head of Policy	2	3	6	Mitigate	Good early planning with the project lead	Education / Policy	Completed	2	2	4	Aug/Sept 2024	4		
ELT	6 ELT6	Strategy	ELT Capacity Issues & succession planning	Inadequate (inability to) succession plan in place to avoid key staff departures impacts organisational resilience and loss of corporate memory; or rapid rise in required expertise or capacity result in Single point of failure, or failure to respond to statutory or new requirements in an appropriate timescale.	ELT	Chief Executive	4	4>2	8	Mitigate	Established a broader leadership group and heads of service roles as part of people strategy. Leadership dev programme in place. Strategy & Planning sessions ongoing. ELT & SLT notice periods. Design & purpose of ELT & SLG not determined through T3 process. Peer challenge at ELT. Sept workshop to clarify issues, new CEO in place and supporting ELT colleagues.	Chief Executive	Ongoing	2	3>2	4	Aug/Sept 2024	4	Open	Once all ELT & SLT rolls filled, with FTE's should lower risk. Corporate and Dept level succession plans. Is ELT Succession plan in place.
ELT	8 ELT8	Strategy	Lack of Succession Planning	Single points of failure and inadequate corporate memory will affect organisational resilience due to weaknesses in succession planning, knowledge sharing and process documentation.	ELT	Chief Executive	4	3	12	Mitigate	Address single points of failure in organisational design, handover periods between interim & permanent positions wherever possible. HR workforce planning, Leadership Dev programme, Change control.	Chief Executive	Ongoing	3	3	9	Aug/Sept 2024	6	Open	Corp plan succession plng update.
ELT	New ELT12	Finance	Failure of sustainable funding	Required level of proposed and future increased funding obtained through proposed fee rises are not delivered on time or at a reduced amount placing an unsustainable financial burden on HCPC, resulting in being unable to deliver regulatory functions		Exec Dir of RBP	5	5>4	20	Mitigate	Very close working relationship with DHSC officials, and home country governments, extensive consultation with stakeholders including unions and professional bodies. Proposed fee rise input not included in budget calculation, balanced budget to bring down cost base, international income, onward plan for fee rises.	ELT	Ongoing	3	4	12	Aug/Sept 2024		Measured	
ELT	New ELT13	Operations	Failure to respond to Regulatory reform in a timely manner	Regulatory reform cannot be delivered in the proposed time scale due to funding, and timing constraints restricting the pace and quality of work to be undertaken.		CEO	4	4	16	Mitigate	Close engagement with DHSC, Policy & Standards holding working relationship with DHSC at initial stages of project, Costs associated with programme of work required being developed by Deputy Interim CEO, existing fee rise proposal to help fund required work. Major risk in draft budget for 2024-5	ELT	When timetable confirmed?	4	3	12	Aug/Sept 2024		Open	
ELT	New ELT14	Reputation	Tone of Voice project - failure to deliver	Tone of Voice project fails to deliver required changes within the regulatory departments in the timescale required resulting in the perception of HCPC being a less compassionate regulator and not regaining outstanding PSA standard 18.			4	3	12	Mitigate	The review of all templates and information sheets is on track to conclude by the end of September 2023. This is a revised timeline as the project was initially expected to complete in Q4 2022-23 but we are on track against this. This will be followed by tone of voice training for all team members. About to test templates in FTP. Proj for next year being considered. Similar approach to FTP in Reg & EDU	Hd of FTP; then Hd of Reg; Hd of Edu.	01/10/2023	3	2	6	Aug/Sept 2024	4	Open	
FIN	11 FIN1	Finance	Income System Failures	Process failures and accounting errors will impact the service delivered to registrants and lead to financial losses due to the new Income System not meeting business requirements and requiring multiple manual supporting processes.	Finance and Procurement	Head of Finance	5	5	25	Mitigate	BC Reimplementation bids received from KPMG and Cognizant. Additional expertise will be sought to support supplier selection process with Gartner's help, who are market intelligence company with experience within the IT sector. Project Board has been set up, as per Exec Dir of Resources & Bus Performance instructions. Includes Kayleigh and Paul (Projects Team), Geoff Kirk (IT), etc. Reduced customisation (out of the box solution in package 1)	Head of Finance	Mar-24	4	3	12	Aug/Sept 2024	5		Data Migration element of project is in house. Phase 2 required for Def inc calculation. KPMG underestimated complexity, e.g. Regn't data. Softcat DOGMA, support contract Platinum package.

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FIN	12 FIN2	Finance	Poor Finance Process Documentation	Process failures and accounting errors will impact the service delivered to registrants and lead to financial losses due to current finance processes not being fully documented and there being an over-reliance on specific staff's process knowledge.	Finance and Procurement	Head of Finance	5	5	25	Mitigate	Walk-through videos, guidance notes and handover material has been produced and will be incorporated within our detailed month-end timetable with covers assigned to mitigate instances that task owners are not available. Process Docs. BC processes and training will produce an requirement for train the trainer to roll out to rest of organisation. Training to be provided, functional and bespoke - docs on Microsoft website. BC specialist to be recruited. In post month, all as is, to be plus training material, for Finance & users.	Head of Finance	95% complete Available on Microsoft website	2	2>1	2	Aug/Sept 2024	4		BC training will be required plus new documentation
FIN	13 FIN3	Finance	Finance Department Resourcing Limitations	Process failures and accounting errors will impact the service delivered to registrants and lead to financial losses due to there being too few permanent staff to operate finance processes effectively and a reliance on temporary staff who do not have sufficient process knowledge.	Finance and Procurement	Head of Finance	5	3	15	Mitigate	Full other than Payroll Officer reqrd, plus apprentice for Finance Ops	Head of Finance	May-22	3	3>2	6	Aug/Sept 2024	L		
FIN	FIN7	Operations	Payroll Issues	The Payroll process has a single point of failure; internal resource running without long-term back up in place, which will be increased if the service is brought back in house without adequate resourcing and cover.	Finance and Procurement	Head of Finance	4	3	12	Mitigate	Additional cover internally or go back to original supplier with support of Payroll experienced HR team. Mgmt Acct being trained for high level support, in house so recruit p/t or F/T payroll specialist to support Mgr. In place and working. HR trained up also.	Head of Finance	Apr-24	4>3	2	6	Aug/Sept 2024	5		Train up more team members as back up. Payroll & Procurement audit, IFRS 35
FIN	FIN9 NEW		Reporting	Complete payment reconciliation between CE & BC not possible for all Renewal payments without manual intervention introducing additional work and room for error.	Finance and Procurement	Head of Finance	4	4	16	Mitigate	Awaiting full BC impl'n	Head of Finance	May-24	2	2	4	Aug/Sept 2024			Def inc module after go live
FIN	FIN10 NEW		Two External auditors	Reworking and disagreements on methodology or interpretation when managing two auditors creates delays and additional work potentially impacting cost and deadlines.	Finance and Procurement	Exec Dir of Resources	4	3	12	Mitigate	Potentially reduce number of external auditors to one (NAO). Contract to be extended with HM, ISA 600 reqmts. Extend for further year. NAO will be sole auditor for 2024-25FY.	Head of Finance	Apr-25	3	2	4	Aug/Sept 2024			1 yr. extn
FTP	38 FTP1	Operations	FTP Process Inefficiencies	Inefficiencies in the FTP process will affect the delivery of organisational objectives due to FTP being a large percentage of HCPC's spend and FTP volumes and costs increasing.	FTP	Exec Dir of FTP & TS	3	3	9	Mitigate	1. FTP improvement programme still running, (Nexus phase 2 sprint in place, (Completed) 4 more to go). Online concerns form to be delivered by QTR1 2024. Front loading reqrs Nexus stages effectively	Head of Fitness to Practise	01/05/2024 What date now?	3	3	9	Aug/Sept 2024	6		List of potential inefficiencies in systems and process?
FTP	39 FTP2	Operations	FTP Improvement Project Failure	Failure or slow delivery of the FTP Improvement Programme will impact the effectiveness of existing FTP processes and limit the capacity and capability to deliver ongoing FTP improvements due to the Programme being too complex or allocated budgets being exceeded.	FTP	Exec Dir of FTP & TS	4	3>4	16	Mitigate	2nd phase of FTP improvement programme ongoing, monitor on an ongoing basis. Need for review of future changes, priorities of project in light of latest PSA report. Also in light of Reg Reform. Probability of PSA action is lowered by achieving more standards. STD 18 Cust Service (Front Loading) & Protection of Title	Head of Fitness to Practise	31/12/2023; internally 01/04/2024	4	2>3	12	Aug/Sept 2024	4		Protection of Title to do.
FTP	42 FTP5	Public Protection	Workload Impact	The FTP case backlog becoming unsustainable due to insufficient workforce to cover an influx of cases will impact public protection and the reputation of HCPC if hearings cannot be held remotely and department responsiveness is impacted by planning uncertainty.	FTP	Exec Dir of FTP & TS	3	3>4	12	Mitigate	1) FTP improvement programme 3) Seeking permanent Rules change to allow remote hearings 5) Forecasting based on trend monitoring, incoming complaints 6) Increased headcount in all areas this FY 7) Monthly case load monitoring in each area. 8) Capacity issues can be addressed by an existing overflow arrangement in external provider contracts (complete outsourcing of some cases) 9) Growing Investigations workload being addressed. Additional workforce if required. 10) Two new Head roles to provide oversight and support. Plus specific Exec Dir of FTP. 9)Front loading should progress cases faster, depleting backlog.	Head of Fitness to Practise	Started from 31/12/2021.	3>4	2>3	12	Aug/Sept 2024	4		Rolling recruitment and succession planning in new year.

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FTP	FTP7	Operations	Capability	FTP / HCPTS Partners poor quality / appropriate or lack of decision making. NOT RESOLVED AT THIS POINT	FTP	Exec Dir of FTP & TS	5	3	15	Mitigate	Need to establish requirement for a governance process, or determine if not required due to Partner employment status Partners have recently been removed due to incorrect interpretation of the law. PRC oversight, PWC Feedback after every hearing, ADJ group, eval themes, adjournments, DRG, Appls etc PSA feedback at case conclusion. ICP & Panel Chair trng every year, and mand eLearning. Quick to take action against PTNRS that do not perform appropriately. Practise note review group, to manage Partner Quality. Overseen by ELT & BM.	Head of Fitness to Practise		3	2>3	9	Aug/Sept 2024			
FTP	FTP8 10/07/2023 3 New		Poor quality decisions impact public protection	Decision making and reasoning by Partners or HCPC/HCPTS employees may fail to protect the public.(Including the guidance for Partners - Practise Notes, legal input and ELT sign off)	FTP	Exec Dir of FTP & TS	4	2	8	Mitigate	Recruitment proc trng 4 staff & Ptnrs, DAG, QA, DRG checks. Built in sign off process, elevated sign off routes if appropriate. Regained Decision making standard, DRG, Threshold, SNR decision makers in place. Threshold set low to lessen chance of incorrect closure. Allegations also approved before "going out". Updating Practise notes, rvw BM&ELT. Meeting STD 16 (PSA)	Head of Fitness to Practise		4	2	8	Aug/Sept 2024	5		Panel Chair & Legal Assessor trng May 2024, x5 Half Day sessions; eLearning module to be developed.
FTP	FTP12 NEW 21/06/2024		Acceptability of non UK origin FTP evidence	The reliability and evidential weight of External (non UK) evidence may impact the progression of FTP cases	FTP	Exec Dir of FTP & TS	N/A	N/A			<i>Under consideration</i>									
FTP	FTP13 NEW Aug 2024		Failure of Outsourced case management	Failure of suppliers to adequately manage outsourced cases, resulting in failure of public protection	FTP	Exec Dir of FTP & TS	5	3	15	Mitigate	Develop internal monitoring systems and triggers to manage outsourced cases, with escalation procedures and robust account management.	FTP	Immediate	5	2	10				
GOV	43 GOV1	Operations	Unclear Corporate Reporting Responsibilities	Ineffective corporate reporting will impact the reputation of HCPC and cause performance assessment issues due to reporting responsibilities not being clearly defined.	Governance & CCEO	Exec Dir Corporate Affairs	3	4	12	Mitigate	Monthly Dir reporting to ELT, redefined KPI's for Council, capability of analysis to be determined. Council & Committee reporting well defined. Exec Dir of Resources & Bus Perf started. Annual Report working group meets weekly, ARAC oversight; PSA coordination, liaison provided by QA Lead. Code of Corporate Governance, Committees report to council on matters considered each year. Established leadership team in place. CCEO will provide dedicated support to this process, to be reviewed by interested parties. Review of KPI's across the organisation.	CCEO; (Hd of Gov Oct 2023)	Current	3	3>2	6	Aug/Sept 2024	4		Exec Dir Bus Perf to PRC on regular basis, Nov PRC. ELT Terms of Ref 2B rvwd, underway. Data Quality auditing/ assurance. Improv to Finance System to ease Fin rptg. Council member inductions, Comm members change. Corp Affairs area being covered by other ELT members. Standing Orders for Council & Cmmt being reviewed. Council Effectiveness Rvw, externally facilitated.

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GOV	47 GOV3	Governance	Council Effectiveness	The quality of Council decision making will impact the ability of HCPC to plan and achieve its objectives due to the Council not receiving adequate information, not having time to review all options and not having the correct range of skills and training.	Governance	Exec Dir Corporate Affairs	4	4	16	Mitigate	Governance and ELT oversight, guidance, set cover sheet, internal and external review. Skills matrix for members, gap analysis, regular Council seminars, policy issues, risk appetite, succession planning, regular perf rvwd, including 360, members perf and review, undertake e-Learning as employees, agenda planning with Chair & Hd of Gov, monitoring of Council time. In depth member inductions for Council members. Review of Council effectiveness 2024/25. Committees internally carrying out rvw of effectiveness. New cover sheet for consultation with SLG (ELT, Council, Committees)	Head of Governance when in place	Current	3	3	9	Aug/Sept 2024	6		Rvw paper writing guidance, improved EDI guidance for paper writers. - On hold. Council Dev plan. Council effectiveness review Oct /Nov2024 <i>Improved Council Mbr review when Gov team in place.</i> Poss in-house input in future. <i>Unitary Board prep would involve ELT & Council members.</i>
GOV	50 GOV5	Reputation	Non-adherence to the Code of Corporate Governance	Council members not adhering to the code of corporate governance will impact the reputation of HCPC	Governance	Exec Dir Corporate Affairs	5	3	15	Mitigate	(Being supported at required levels by stretching resources) TO BE REVIEWED - [Code of Corp Gov], in progress 2024	Head of Governance	Current	3	2>3	9	Aug/Sept 2024	6		Rvw scheme of delegation coming Yr., Review Code of Corp Gov next FY (2023/4) Still Q1 4/5
GOV	GOV8	Governance	Corp Affairs team spread too thin - requires changed capabilities	New roles across the existing GAP team will lead to potential risk of over stretched resources in the short term, whilst full time governance team are not in place.	Governance	Exec Dir Corporate Affairs	4	4	16	Mitigate	Existing Gov roles working across Council & Committees will continue to support existing processes whilst developing new roles.	ED of GAP	Q3	3	2>3	9	Aug/Sept 2024	2	Measured	Full cross training where applicable.
GOV	GOV10	Governance		Unclear definition of responsibilities between Governance and CCE areas.	Governance	Exec Dir Corporate Affairs	3	3	9	Mitigate	Workshop between GOV & CCE areas to determine responsibilities	Head of GOV & BM CCE					Aug/Sept 2024			
HR	18-E HRD1	Operations	Recruitment	An inability to recruit quality candidates in a competitive job market. Or impact of internal movement deprives some functions of trained employees creating new vacancies.	HR and OD	Head of Human Resources	3	4	12	Mitigate	People Strategy which has direct focus on developing the employer brand, recruitment strategies and retention completed. Focus on behaviours, aligning these through APDR and employee engagement. Robust onboarding to prevent dishonest employees starting. Upgrade project for recruitment portal, to proceed, 8 week time scale once initiated. Will deliver into Google etc Total Jobs or Reed automatically. Only cv & supporting letter required, and trigger questions relating to qualifications.	Head of Human Resources	Ongoing	3	2	6	Aug/Sept 2024	6		Develop internal talent pool, live feeds, employee stories etc. Enhance employer brand, long term project. Upskill existing HR team.
HR	19 HRD2	Operations	Limited Career Development Opportunities	Limited career development opportunities will affect employee churn rates and employee wellbeing and lead to single points of failure due to a lack of effective succession planning and unclear career paths.	HR and OD	Head of Human Resources	3	4	12	Mitigate	Develop a new organisational Succession plan which focuses on career development opportunities. In progress. L&D programmes about to roll out; x30 internal candidates progressed in careers at HCPC. Apprentices in I&A, Policy, Finance to start or started. Aspiring Leaders launched, Mgmt Dev prog in 2023/4. SLG succession planning trng 17th Oct. 2 mnths to completion.	Head of Human Resources	Ongoing	3	3	9	Aug/Sept 2024	6		Formal succession plan data collection with Heads of, by end of FY 2022/23 Succession planning workshop at Sept SLG. Current skills vs addnl rqmt for training to allow stepping up to new job.

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HR	21 HRD4	Operations	Staff Morale Issues	Low levels of employee morale will affect employee wellbeing and churn rates and reduce the level of service delivered by HCPC due to a poor perception of HCPC amongst employees, a high level of organisational change and increasing job demands.	HR and OD	Head of Human Resources	3	4	12	Mitigate	The new ways of working policy along with the introduction of an employee engagement strategy will enhance employee morale. For example, employees will be asked to participate in identifying behaviours for all HCPC values. Workshops from Nov 2021. Pulse survey, seem happy with hybrid working, organisational aims, recommend HCPC as employer, and exit intvws. One day employee session on Pulse Survey results (June 2023), 40 to 60% engagement result = 77% of respondents happy.	Head of Human Resources	Ongoing	2	2	4	Aug/Sept 2024	4		Team specific, e.g. Reg & FTP teams have onsite requirements. Standard Operating Hours. Try to make approach more uniform as to nos of days in office. Reconfig reqrd.
HR	HRD5	Operations	Failure or withdrawal of payroll services	Payroll supplier insourcing may result in adverse effects on employees remuneration.	HR and OD	Head of Human Resources	4	4	16	Mitigate	Contractual controls on termination of services on both side of contract. Testing back office rules of CoreHR functionality to fit HCPC as possible solution. June/July 2023, in boarding following Health Check by CoreHR, plus inhouse training. Ongoing rotating support of HR on a monthly basis. Insourced over 2023/4.	Head of Human Resources; Head of Finance	Ongoing	4	3>2	8	Aug/Sept 2024	8		Bring payroll in house, contract in place until 2024 as back up.
HR	HRD7		Border Agency changes impact overall costs of employment	Border Agency sponsorship licence threshold lowers base salary requirement to include all roles at HCPC, potentially creating potential for costly employees on low base salary. (Adding £10k per role employed by this route)	HR & OD	Hd of HR	3	3	9		Roles at all salary ranges can typically be recruited via UK job applicants negating requirement for sponsored roles at HCPC. Gov increase level by £10k so lowers risk. (No longer being a sponsored employer £38k - £40k)			2	2.5	5	Aug/Sept 2024			
ICS	44 ICS1	Information Security	Information Security Policies Not Being Followed	Information security breaches will impact the confidentiality, integrity and availability of HCPC and stakeholder data due to staff not following information security policies for data handling, redaction and encryption.	Information & Cyber Governance	CISRO	C = 4 I = 4 A = 4	C = 4 I = 4 A = 4	C = 16 I = 16 A = 16	Mitigate	Reporting culture to see where not following requirements leads to incidents, and custom mitigations for specific areas.	CISRO / Ex Dir of Governance Assurance & Planning	Current	C = 3 I = 3 A = 3	C = 2>3 I = 2>3 A = 2>3	C = 9 I = 9 A = 9	Aug/Sept 2024	C=5 I=5 A=5	Minimal	
ICS	GOV7	Governance	Submission of FOI or SAR requests to disrupt HCPC	Governance processes used to disrupt the organisation due to abuse of FOI & SAR systems in a vexatious manner by those unhappy with regulatory decisions. Significant & Complex cases can be difficult to manage.	Information & Cyber Governance	Exec Dir Corporate Affairs	3	3	9	Mitigate	Vexatious policy in some circumstances. Some multiple requests by apparent different parties cannot be mitigated unless material publish to website. Cross train additional employees to carryout FOI & SAR requests. Where multiple identities are being used to submit repeat requests require proof of identity and full name as allowed under ICO Guidance.	CISRO / InfoGov Mgr	Ongoing	C=3 I=3 A=3	C=2 I=2 A=2	C = 6 I = 6 A = 6	Aug/Sept 2024	C=4 I=4 A=4	Minimal	Vexatious complaints process to be reviewed. All employee meeting content
ICS	ICS11		Technical issues prevent rapid response to threats	Difficulty in implementing additional controls to respond to infosec challenges makes cyber security more at risk, resulting in potential infiltration or exfiltration.	IT & CISRO	CISRO; Head of IT	C=5 I=5 A=5	C=4 I=4 A=4	C=20 I=20 A=20	Mitigate	Use large scale professional services firms with experience of HCPC's core technologies and maintain IT employee training. Use specialist, experienced companies for key technology areas.	Head of IT / CISRO	Ongoing	C=5 I=5 A=5	C=3 I=3 A=3	C=15 I=15 A=15	Aug/Sept 2024	C=5 I=5 A=5	Minimal	Looking to determine what is the next escalation we can put in place should CAPTCHA be circumvented by AI technologies
ICS	ICS12		Business Continuity & Disaster Recovery	Departmental Business Continuity / Disaster Recovery set up is insufficient to protect the organisation from harm during an unplanned event	CISRO	CISRO & SLG/ELT	C=5 I=5 A=5	C=4 I=4 A=4	C=20 I=20 A=20	Mitigate	Regularly test BCM plans as desktop or full exercises on dept or company wide basis, regular request for process updates to be supported. Succession planning	CISRO & SLG	Ongoing	C=4 I=4 A=4	C=3 I=3 A=3	C=12 I=12 A=12	Aug/Sept 2024	C=6 I=6 A=8	Minimal	Cloud based infrastructure offers little availability should the Cloud provider fail, particularly where SaaS is used. Fail over to another Cloud provider very expensive.

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IT	53 IT7	Information Security	Successful Cyber Security Attack	A successful cyber security attack will impact the confidentiality, integrity and availability of HCPC systems and data	IT	Head of IT & Digital Transformation	4	3>4	16	Mitigate	Combination of ISO27001 & Cyber Essentials Plus to maintain minimal level of control as a baseline E5 roll out in coming year but deployment extended. Audit actions from BDO. NIST asset threats and mitigations underway. Microsoft evaluated portal & B2C environment (Powerpages). Rnw portal (Dot.Net) to be rvwd	Head of IT, Exec Dir of Corp Affairs	31/03/2025	4	2	8	Aug/Sept 2024	6		Gradual move away from G drive to SharePoint / Azure. BDO Audit report, reqmts being implnt'd. E5, to be rolled out over next financial year 23/24. In-depth review following latest unsc attack.
IT	IT6	Information Security	Data loss	Employee and member working leads to data risk loss which cannot be prevented by traditional approaches	IT	Head of IT & Digital and CISRO	4	3	12	Mitigate	Introduce automated controls around data loss prevention (IT) Ensure all staff and members are trained & understand their responsibilities (Gov) E5 agreed from Jan 2023; DLP etc Target 2024/25 project. SLG remit to cover InfoGov reqs	Head of IT & DT Exec Dir Corp Affairs	30/03/2025	3	2>3	9	Aug/Sept 2024	6>4		Azure DLP, categorise docs and track & delete if outside controlled area. This Financial yr (E5) DPL etc, impl plan over next 12 months at least
IT	IT4	Operations	ITDR arrangements	IT disaster recovery and resilience arrangements to not work as expected	IT	Head of IT&DT	5	3	15	Mitigate	Review ITDR arrangements in light of new ways of working (IT) Undertake regular testing of individual components, and of overall response (IT) ongoing. Ensure dept business continuity plans include provisions for how to continue essential services without IT (Gov). On prem Finance system no longer used.	Head of IT&DT Head of Gov	31/03/2024	3	2	6	Aug/Sept 2024	6		Sage to be replaced with Business Central
IT	IT5	Operations	IT skills, capacity and resources	Failure to ensure that sufficient IT & Digital skills, capacity, processes and resources with clarity on responsibilities, are in place to meet organisational expectations, manage InfoSec threats and deliver the corporate plan.	IT	Head of IT&DT	4	>5	20	Mitigate	Update the DT Strategy to provide an agreed roadmap for technology requirements and how these will be met. Review team structure and roles. Enhance team knowledge to allow for succession planning. Undertake benchmarking against peers and best practices. Dig Strat to be signed off next week. Reskill IT team and potentially restructure, skills gap across HCPC. Agency Infr Engineer as backfill in 2023-4 (Temp fix) Potential new IT Sec role proposed.2024? Solution design capability, Business Analysis in Business Change to be upgraded internally.	Head of IT&DT	Q2 2024 Potential restructure 01/09/2024	3>4	4>3>4	16	Aug/Sept 2024	6>9		Eval Dig skills across HCPC, not all in IT, e.g. Comms, L&D impact etc.
I&A	29 I&A1	Operations	Lack of Intelligence Gathering and Analysis Processes	A lack of coordinated intelligence gathering and analysis will impact the reputation of HCPC due to appropriate expertise and associated processes still to be fully funded. Organisational level deficit of protocols and processes for describing, capturing, compiling, analysing and sharing data.	Insight & Analytics	Exec Dir ERRS	3	4	12	Mitigate	I&A workplan in place, ongoing development for next FY. Alternative task specific data platform being developed with ADATIS to improve data quality and accessibility and hence enable priority analyses via Minimum Data Set under development. Protocols & processes to be continued. Potential new Future State of Data, programme being discussed. Defined workflow for analysis, about to be implemented.	Head of IT & Head of Insight & Analytics	Feb/Mar 2024	3	2	6	Aug/Sept 2024	3	Open	MDS; Reporting Team in future
I&A	I&A3	Operations	Impact of future Data accuracy	Data quality (current & future) is the greatest threat to meaningful intelligence, as validation must be in place to prevent future data errors.	Insight & Analytics	Exec Dir ERRS	3	5	15	Mitigate	Minimum Data Set under development, Known holes in validation in backlog for Reg System dev. Potential for data quality reporting for tracking, when correctly implemented	Hd of Reg; Hd of FTP; Hd of Edu	Ongoing	3	3	9	Aug/Sept 2024	4	Open	

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OFS	80 OFS1	Operations	Non-compliance to Fire Safety Regulations	Non compliance to fire safety regulations will increase the risk of a fire leading to a building being destroyed or being unavailable for a significant period of time due to buildings requiring a range of remedial work to achieve compliance to evolving fire safety regulations.	Office Services	Head of Estates and Facilities Management	4>5	1>2	10	Mitigate	Service & Maintenance contracts in place for related systems and services; regular audit of H&S; employee training, building signage, monitored alarms systems, emergency lighting, regular fire evacuation tests (outside pandemic conditions). Weekly testing of audible alarm systems and intercom systems (plus lift), GCC included as leaseholders to HCPC, ensure Fire Warden & First Aiders are in place within GCC. Emergency evacuation chairs located strategically around estate. External Fire Risk Assessments annually.	Facilities Manager	Scheduled compliance testing, and systems already implemented. Ongoing review.	4	1	4	Aug/Sept 2024	4	Minimal	
OFS	81 OFS2	Operations	Building Plant End of Life	Building plant failures and non compliance to standards will affect office availability and the quality of the office environment due to equipment such as boilers, air conditioning and lifts reaching end of life and requiring replacement. Due to stock limits, increased cost of holding stock, availability of spare parts; becoming increasingly difficult for older assets, making continued use more costly and difficult.	Office Services	Head of Estates and Facilities Management	3>4	4>3	12	Mitigate	Planned preventative maintenance contracts in place; reactive maintenance as required until funding for replacement plant is available. Extend life on some plant to maximise ROI via enhanced maint contracts. End of Life for some systems to be defined more closely, cost & timing. Ongoing monitoring of existing equip, monitoring what could be in budget as replacement items in future. Heat exchangers to be rolled out where not in place.	Head of Estates and Facilities Management, Facilities Mgr	PPM scheduled, Reactive beyond budget with ELT approval	3	2	6	Aug/Sept 2024	4		Contractor to review future req, analyse & design for future system, heating replacement. Air Source Heat pumps when technology more suitable to environment.
OFS	83 OFS4	Operations	Inability to Process Post	Inability to process departmental post will affect the delivery of services to stakeholders due to HCPC offices not being accessible or equipment such as scanners not being available. Includes impact of industrial action. Physical handling of incoming departmental post (internally) or outbound mail holds risk of non delivery of physical mail, resulting in missed invoices or court documents.	Office Services	Head of Estates and Facilities Management	2>4	2>3	12	Mitigate	Franking machine is leased equipment with support contract and maintenance, potential reduction in post requirement long term as Digital First strategy delivers more services online. Special Delivery items posted via local Post Office in Kennington or on-site. Much reduced use of traditional paper mail in HCPC, in and out of office. Pidgeon hole use has been started again, requiring recipient activity. Company addressed mail opened by Hd of EFM or Facilities Mgr.	Facilities Manager (plus Dept heads)	In place, digital first strategy underway but difficult to predict impact on postal requirement at present. Court Documents impact is significant	1>4	2	8	Aug/Sept 2024	4		Internal Audit of Dept collection of post (incoming). Scan incoming mail at arrival, to mitigate lack of dept collections. Outsourced potentially.
OFS	OFS7	Operations	Inflationary pressures on cost of office operation.	Projected financial resources are insufficient to maintain heating and lighting required for safe and compliant operation of the buildings resulting in unfunded pressures due to utility costs. Stock availability may be reduced due to cost of suppliers holding stock in warehouses decreases availability, replaced by ordering direct to site with longer lead times for repair. Economic stability may influence £ purchase power (energy wholesale is in US\$). Potential issues around shipping of spare parts or raw materials could impact delivery of services. Electricity, maint contracts inflation, Nat Living Wage impact on cleaning & security costs.	Office Services	Head of Estates and Facilities Management	4>3	4>3	9	Mitigate	Factor in fuel costs and other inflationary factors to OFS budget and reforecasting. Government price cap on energy costs, established utilities trading strategy, to stabilize future cost model. Migrating on to adjusted future cost & pymt model via CCS, extended time frames.	Head of Estates and Facilities Management & Head of Finance & Procurement	Ongoing	4>3>2	4>3	6	Aug/Sept 2024	10		Replace heating systems for more efficient systems long term if technology is efficient enough to use existing infrastructure. New Framework agreements (Enviro factors) even if not lowering costs.
OFS	OFS8 NEW		Environmental compliance	Sustainability compliance with fluid gvmt regulation and HCPC internal targets results in inadequate records, performance and reporting scheme.	ELT	Exec Dir of Resources & Head of Estates and Facilities Management & Head of Finance & Procurement	4	4	16	Mitigate	Criteria added into procurement templates for evaluation exercises. Environmental Management system under investigation, with potential to attain ISO 14001:2015. Potential GRC system to manage ISO requirements across HCPC, ISO27001, 14001, 9001 etc. Add in CBF collection of AI impacts on environmental responsibilities.	Head of Estates and Facilities Management & Head of Finance & Procurement	Scope 1 no gas 2027/8 Scope 2 2023 net zero electricity meet Scope 3 2039/40 all other (indirect suppliers impacts)	3	3	9	Aug/Sept 2024	6	Measured	Net Zero 2028/9 Gas & Elec target to be agreed (Elec already in place from April 2023). Ongoing work with framework providers. Targets agreed by Council, for mission scope targets, 1 gas,2 electricity,3 suppliers

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PTNR	16-b PTNR1	Finance	Enforced Partner Contract Changes	(Historic Partner contracts) A requirement to convert partner contracts to worker contracts will lead to significant costs for HCPC due to changes in how employment law is interpreted and applied.	Partner	Exec Dir of Corp Affairs Partner Project Lead	4	5	20	Mitigate	Create robust enforceable partner contracts which lower risks of legal challenge in future. Task & Finish Group established. Draft contract being reviewed in light of changing legal requirements. Governance input required to progress. Internal guidance on PAYE, NI & pensions.) Holiday remedy not completed. Update & recommendation paper on Contract presented to ELT & PRC, pension etc fee impact & holiday pymt; KC contracted on PAYE & NI aspects etc. Aiming at 2025 April roll out, some budget in reserves.	Exec Dir Corp Affairs Partners Project Lead	31.07.22	4	4	16	Aug/Sept 2024	8		Potential outcomes calculated. Draft contracts, T&C's reqd
PTNR	17 PTNR3	Reputation	Ineffective Partner Training	An inability to provide effective partner training will affect partner performance, the reputation of HCPC and cause non-compliance to PSA standards due to difficulties in monitoring training effectiveness, damaging public protection ensuring it meets changing requirements and ensuring that partner's are fully engaged with it.	Partner	Exec Dir of Corp Affairs Partner Project Lead	4	3	12	Mitigate	Ongoing annual reviews with stakeholder input and aligned to the outcome of the tribunal case. Updated KPI Partner rpt, feedback survey on training effectiveness, updated training programme, e-learning, ongoing and up to date with current practise, legal partner based training for all partners. QA of services provided by Partners. Those not completing training not used. QA drafting practices for common Partner roles, leading to KPI's eventually, when data is available.12 contracts terminated due to non compliance to training, 2 more to go. Training guidance updated, to reflect training shortfalls.	QA & Partner Project Lead, plus operational depts	31.03.22	3	3	9	Aug/Sept 2024	3		QA of Reg Ass & CPD Ass decisions, FTP, then EDU finally.
PTNR	18-P PTNR4	Operations	Recruitment and Retention Issues	An inability to recruit and retain partners will lead to higher training and churn costs and reduce the quality of service delivered by HCPC due to a competitive job market and a poor perception of HCPC amongst partners.	Partner		3	3	9	Mitigate	Work closely with colleagues across the business to support retention and recruitment of partners. Visitor role becoming more difficult to recruit to. Review roles and engagement with partners and consider alternate solutions. Engagement work with Comms team, more info on website, PTNRS interviews etc. EDU & FTP monthly mtgs to assess reqmnts. Largest ever response for Reg Ptnrs. Own resources, prof bodies. Small professions remain potential source of difficulty.	Partner Project Lead	30.09.21	3	3>2	6	Aug/Sept 2024	3	Measured	Reg Assessors rec underway, more difficult roles to fill so determine if overall impact of availability potentially across all Reg roles. Vol Ptnr resignations, Partners satisfaction survey results may provide feedback, Differing roles Lead (that goes on visits) and regular. paperwork based, underutilised)
PTNR	PTNR5		Poor quality Partner decisions	Inconsistent or poor quality decisions by Partners result in lack of trust in HCPC regulatory decisions. SPLIT OUT RISK TO REGULATORY DEPTS _ UNDER DISCUSSION	Partner	Partner Project Lead	4	3	12	Mitigate	Regular robust training, analysis of feedback from S.29 reviews (PSA), internal audits, ICP separation. Decision Review Group & Decision Assurance Group & Legally Qualified Chairs for ICP. Workshop output to ELT BE & AC outputs to determine reqmnts. New ROA's monitoring in Reg going forward.			4	2	8	Aug/Sept 2024	6		Proj around Reg Assessors, justification for decisions to be recorded. Move through roles to enhance quality.

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PTNR	PTNR6		Partner Diversity pool	Partner diversity does not reflect registrant or lay or legal service provider characteristics due to restrictions on the recruitment pool available at time of service planning, and actual recruitment.	Partner	Exec Dir of Corp Affairs Partner Project Lead	3	3	9		Registrant Partners compared to Registrant population. Lay Partners compared to UK population base line. Legal Assessors, 10yr practice cert as evidence To be determined. Updating website content to attract more diverse Ptnr pool. Data provided for 2/3 of profs, then overarching ng comparison. Regnt vs. Ptnr pools. EDI of recent applicants and offers to be determined.			3	2	6	Aug/Sept 2024	To be determined		50% of profs EDI examined so far. 70 White Brit vs 30 Smaller ethnic groups. Only FTP & Reg Appeal Ptnrs have a fixed life cycle. CS & PYL registrants asked to apply. Ethnicity in Panel Chair ethnicity lacking! Talk to I&A about potential EDI reporting against Register EDI.
PTNR	PTNR7	Operations	Partner Dept workload	Increased operational workloads due to changing Partner contracts reflecting updated requirements place increased pressure on Partners Dept. (Additional ancillary requirements for pension, payroll etc for Partners will drastically increase effort required).	Partner	Exec Dir of Corp Affairs Partner Project Lead	4	3	12	Mitigate	Rebranding exercise assists, looking for additional mitigations, keep the role attractive, more broad role etc. Succession planning difficult with small team, Admin support 6mth/yr. for when new Contracts to be rolled out.	Hd of Reg, (Hd of FTP), Hd of Edu,		3	3	9	Aug/Sept 2024	4		Some risk around small team may need to be addressed to cover changes to processes.
PTNR	PTNR8	Operations	Partner value for money	Updated (NMC case compliant) Partner contracts may reflect poor value for money, whilst increasing operational costs.	Partner	Partner Project Lead	4	4	16	Mitigate	PWC project, looking at potential cost saving to lower cost per unit to allow for change in additional contract costs in future. Pymt issues & Cancellation issues being enhanced. QA work across Ptnr areas. Strengthening financial controls. BC will improve control, decision making in Reg depts to be improved.	Partner Project Lead		4	3	12	Aug/Sept 2024	9		Reg Assessors. System changes required to effectively report KPI's, so manual measured required as interim fixes.
PUSR	PUSR1	Operations	Incorrect understanding of standards documentation	Incorrect articulation of standards for stakeholders results in incorrect interpretation by registrants.	Prof & Upstream	Exec Dir Corporate Affairs	3	3	9	Mitigate	Content shared with Policy originators, to validate Prof & Upstream materials and interpretation prior to use with stakeholders. Very good relationship with Comms dept, good awareness of up and coming events. Shared content between group, and prof bodies. Full representation in 4 home countries. Signed off content will reduce risk as new standards are rolled out.	Head of Professionalism and upstream regulation		2	2	4	Aug/Sept 2024	4		Content is the issue, not the process of sign off.- better mapping required. Future SCPE webinars. Potentially testing peoples knowledge. E.g. Quiz at end of Joining the UK workforce session.
PUSR	PUSR2 New risk	Operations	Lack of established process for the recording and sharing of information and intelligence and prompting an appropriate response from the organisation.	Intelligence collected from upstream areas does not reach appropriate internal stakeholders in a useful or useable format resulting in lost opportunities, reputational damage or patient harm or PUR reputational damage.	Prof & Upstream	Exec Dir Corporate Affairs	4	4	16	Mitigate	Intelligence log in place, robustly enforced this year, able to flag immediate responses required. Monthly report to ELT updated to include intelligence.	Head of Professionalism and upstream regulation / Potentially organisation wide.	In place	4	3>4	16	Aug/Sept 2024			Need to ensure HCPC beyond PUSR has adequate mechanisms in place.

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PCBR	70 PBC1	Strategy	Absence of Annual Budget Planning	An absence of suitable annual budget planning will impact the delivery of organisational objectives due to project roadmaps not aligning to the organisational strategy.	Project	Programme Manager	4	1	4	Mitigate	<p>Jul 2023: Final TOR agreed for CBF and focus specifically on ensuring Investment papers and decisions underpin strategic objectives, and that critical project decisions impacting and strategy and reviewed when required by the board.</p> <p>Aug 2023: CBF role embedded in the end of year Investment planning process to ensure alignment. Management and tracking of Corporate milestones now adopted into the monthly reporting of the Business Change team</p> <p>Nov 2023: Updated Investment process being used and incorporated the CBF. Initial priorities to be reviewed with ELT on 21/11 following workshops with all heads of function and a review with the CBF. Follow-on steps will be to identify benefits and resources your all key priorities prior to cost estimations and the budget proposal. Each Initiative is now linked to Corporate Milestones.</p> <p>Feb 2024: Prosed to lower the Inherent likelihood to 1 (from 2). The annual budgeting process has now adopted a benefits based approach using a envelope of investment spend. All initiatives are drawn from a prioritisation session linked to the corporate plan objectives and is now in it second year of operation.</p> <p>June 2024: This risk is mitigated. Annual budget process aligned with Corporate milestone planning and the Change and Benefits forum. Investment Cases now include full costs analysis for pre and post project costs and resourcing</p>	Head of Business Change		4	1	4	Aug/Sept 2024	4		BDO Audit on benefit analysis
PCBR	71 PBC2	Strategy	Project Department Resourcing Limitations	Project management resourcing issues will impact the delivery of organisational objectives due to the Project Department not having the required staffing numbers to deliver the high rate of required change.	Project	Head of Business Change	3	1	3	Mitigate	<p>Jun 2023: Recruitment for final two posts in progress, workload prioritisation in place to manage project demand. Presently resource constraints in operational department is biggest factor in delivering the portfolio.</p> <p>Jul 2023: Programme Manager booked off work on long time illness has resulted in resource constraints within the team and the Head of Function needing to pick up the running of the Business Central project.</p> <p>Feb 2024: Development of the project management capabilities continue to grow through mentorship and team development. Processes in place to uplift resources should a conflict of priorities present itself. The experience from the portfolio delivery over the last year indicates that current resources are stable and a expected. No further actions on this risk at the moment.</p> <p>June 2024: No further mitigation changes. Team is fully resourced and ongoing cross skilling and training continues. Upskilling of skills in Business Analysis underway to enable cross team strategic engagement.</p> <p>Aug 2023: Project Support Office and final Project Management role filled.</p> <p>Nov 2023: All projects in the portfolio current have a PM assigned with the exception of Online</p>	Head of Business Change		3	1	3	Aug/Sept 2024	4		Full team in place

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PCBR	72 PBC3	Finance	Lack of an Integrated Financial System	Lack of an integrated financial system will result in inefficient management of project finances and discrepancies between project and finance accounting due to project financial management being a manual, stand alone process.	Project	Head of Business Change	2	1	2	Mitigate	<p>May 2023: Business Central project initiated which will simplify account processes moving forward. Updated processes in place with Finance to review Capital spend targets with Business Change as part of the monthly review.</p> <p>Jun 2023: Noted that overall risk is limited as process in place as part of the project delivery methanoyl provide detailed and accurate tracking of all project spend over a multi-year period. This has been updated to include benefit tracking.</p> <p>Jul 2023: Agreed updated process with Finance to ensure active accruals per month are tracked and recorded in monthly reports by the project management team to support improved forecasting. 3-Year investment spend published each moth as part of the portfolio reporting.</p> <p>Nov 2023: No change in risk mitigation, risk is being managed through regular meetings with Finance, and a monthly review of trackers by the PMO. Future plans should be considered to embed all project accounting requirements in the Finance system.</p> <p>Dec 2024: Scheduled engagements in place with Finance to review CAPEX and OPEX spend. Processes in place to manage project finances as a detailed level with regards to Purchases Orders, Invoicing and receipting. As part of the</p>	Head of Business Change		2	1	2	Aug/Sept 2024	4			Future integration BC potentially, but own detailed tracking anyway.
PCBR	80 PBC9	Operations	Poor change management	Failure to manage change management across the organisation leads to conflicting or missing processes or functions resulting in local failures in regulation	Project	Head of Business Change	4	2	8	Mitigate	<p>Jun 2023: Reinforced processes with team, TOR for Change and Benefits forum updated to include providing advisory capability to the board on key change decisions.</p> <p>Nov 2023: Change and Benefits forum in place to review and ratify changes to key strategies. Methodologies managing change in Projects based on engagement and risk assessments based standardised processes. Updates to project board and membership roles being rolled out later in FY2024-25. Inclusion of governance on board as assurance in key strategic projects.</p> <p>Feb 2024: Recommend reducing the Inherent like hood to 2 to 1 at the next review if conditions remain stable. The approach to change adopted during the Business Central project has resulted in a significant improvement in the management of change impacts. This process and diligence is being embedded in across all change projects.</p> <p>June 2024: No further updates at this stage. All changes for Projects under the governance of Business Change adopted formal Project Management change control.</p>	Head of Business Change		4	1	4	Aug/Sept 2024	5		Jn BDO workshop outputs	

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PCBR	PBC11		IBM Support contract due to expire in Jan 2024	The current supplier agreement for Application development expire in January 2024. Previous experience has shown that 3 - 6 months is needed to successfully negotiate new contracts. If Suppliers are to be changed, a significant effort will be required to conduct a service and knowledge transfer. A supplier relationship is essential for Business Change to conduct their operations.		Head of IT and Digital	5	3	15	Mitigate	<p>Apr 2023: Contract negotiations for renewal being led by IT and Digital transformation.</p> <p>Jun 2023: Contract negotiations for renewal being led by IT and Digital transformation.</p> <p>Jul 2023: Contract negotiations for renewal being led by IT and Digital transformation.</p> <p>Nov 2023: Head of IT and Digital continuing to progress updated contracts and to negotiate on price increases. Constrains need to reflect the Business Central changes from KPMG which need to be aligned to IBM support changes.</p> <p>Feb 2024: Like hood reduced from 3 to 1 as contracts now in place.</p> <p>Jun 2024: IBM contract mitigated through renewal and Business Central support devolved to a new supplier Dogma. Some embedding</p>	HOD (IT) and HOD (BC)		5	2	10	Aug/Sept 2024	3		
PCBR	PBC16	Operations	Poor Third party support	Poor service/ support from third party developers affecting performance of backlog and value for money	Product Mgmt	Product Mgmt Lead	2	3	6	Mitigate	<p>July 2023: Agreed service contract terms – in place with Guidance on briefing and estimating process to product managers. Peer reviews of SOW conducted to ensure estimates for similar work items can be reviewed and compared. Prioritisation meeting in place to provide oversight of the proposed change with IT and Digital</p> <p>Nov 2023: Continuing reviews and assessment and escalation to IT and Digital when supplier issues are detected. Work continues on establishing strong change contracts for discretionary and project change work.</p> <p>Feb 2024: No change in this risk profile.</p> <p>June 2024: Increase in the is risk profile whilst Dogma (BU Support) is fully embedded. This is an ongoing workplan item between Finance, Business Change and IT.</p>	Produce Mgmt Lead	Current	2	2	4	Aug/Sept 2024	3		
P&S	28 POL1	Operations	Policy and Standards Department Resourcing Limitations	Policy and Standards Department resourcing issues will impact its ability to meet the requirements of an evolving organisation and manage BAU, when Regulatory Reform timelines are announced. (HCPC could be next with NMC). Policy Coordination is a potential issue.	Policy and Standards	Deputy CEO & Exec Dir of ERRS	3	5	15	Mitigate	<p>One FTE to replace at Policy Lead level.</p> <p>Requirement for Regulatory reform subject to ELT decision. Business case provided to ELT. Use the NMC (GMC) pre-work to inform HCPC's approach to rules etc, saving time.</p> <p>Two, one experienced member returning. 1 promotion.</p> <p>Backfill resource 1 more person to be fully staffed.</p> <p>Reg reform recruitment within 3 months.</p>	Head of Policy	01/04/2022	3	4>5	15	Aug/Sept 2024	8		Okay, but no major Reg Reform yet

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P&S	30 POL2	Reputation	EDI Non-Compliance	Failing to meet EDI goals will lead to regulatory non-compliances (PSA Standards), inconsistencies in the level of service delivered to specific stakeholder groups and impact the reputation of HCPC due to ineffective EDI data collection processes. EDI requirements not considered during policy or process change result in unintended non compliance with legal requirements.	Policy and Standards	Deputy CEO & Exec Dir of ERRS	4	4	16	Mitigate	1) Registrants EDI information is held alongside the Reg record (infosec assured); comms programme in place to encourage registrants to provide their EDI information to improve coverage. (Integrated into the renewals process.) 2) Appropriate analytical skills inhouse to interpret data across regulatory functions. 3) EDI Lead in post, and EDI action plan in place and running. 4) EDI data capture progressing across registration, ftp and complaints. Prof body liaison, relationship manager approach. 5) EDI Impact analysis process in place. 6) Information supplied to decision makers as required.	Head of Policy Head of Policy Head of IT & Head of Business Change, Head of Insight & Analytics	Mar 2022 Mar 2022 In progress	3 3>2	6	Aug/Sept 2024	6	Measured	Will have been through all profs renewal by this time 2023. FTP data analysis occurring in background. Future collection of complainant EDI data linked to case, and compared to Registrant EDI data. Online concerns form (with EDI data) will delay collection of FTP data and its analysis. Meeting w/ EDI lead re: merging DPA, EDI, ES data	
P&S	POL4	Operations	Lack of Corporate memory and documentation	Poorly documented past legal advice may lead to difficulties should our approach be challenged, resulting in re-evaluation of policies and processes.	Policy and Standards	Deputy CEO & Exec Dir of ERRS	3	3	9	Mitigate	Full review and documentation of our approach to addressing regulatory requirements during the Regulatory Reform process. Rcmd internal legal resource. Inventory of existing (legal and other) advice in the archive. Historic legal advice 2017 onwards, file located within Policy & Stds. Continuing work, reorganise to ensure consistency & accessibility	Head of Policy		3	2	6	Aug/Sept 2024	4		Central repository of past legal advice located. Prepare EDI history at HCPC/HPC/CPS M, RPD to extract historic data, guidance
P&S	POL5	Reputation	Lack of EDI input into policy & process	EDI data, capacity and understanding not fully available to support appropriate oversight of regulatory and business functions resulting in inappropriate actions.	Policy and Standards	Deputy CEO & Exec Dir of ERRS	3>4	4	16	Mitigate	EDI data analysis and interpretation; Progression of EDI Action plan; Council & PRC insight on EDI analysis via periodic papers. Inclusion of SLEDI on Project Boards to improve compliance. EDI steering group in place	Strategic Lead EDI		4	2>3	12	Aug/Sept 2024	8		Data portal in place (for use by internal and external parties to aid analysis)
P&S	POL7		English Language ability evidence	Increased monitoring of English Language capability by evidence may impact incoming workforce, (rather than adjusting scores), with potential for legal challenge.	Policy and Standards	Deputy CEO & Exec Dir of ERRS	4	4	16	Mitigate	Combined Reg, Policy & EDI Lead to determine actions and requirements Council seminar and engagement on EDI future impacts, with English Language as a working example. Post Oct Council potential consultation. Potentially more formal testing. ETC discussions, prof body engagement on options. Consultation underway (Council approval Oct; closes Jan 2024) Generally supportive, ETC discussion imminent, detail of proposals, Council in May. Council approved in May, can begin implementation from Autumn 24	Brendon Edwards?? ***NJ to confirm	2024-5 FY	3	3	9	Aug/Sept 2024	8		Maintained list of intl countries where English would have been used to sufficiently high standard. Increased range of tests to be accepted.
P&S	POL8 NEW	Reputation	Welsh Language scheme	Failure in Compliance with updated Welsh Language scheme within prescribed time scale could lead to reputational damage and fines.	Policy and Standards	Deputy CEO & Exec Dir of ERRS	3	3	9	Mitigate	Evaluate existing processes to operate in Welsh. Build Welsh scheme reqmts into EDI process, but needs to run across rest of business. Deadline is December 2023. June 2024 to 2025 extension (Automated phone message, online registration portal) Met June deadline for auto phone message, online reg portal ext granted	Business Change wrt online reg portal NJ to confirm ***		3	2	6	Aug/Sept 2024	5		

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QA	57 QA1	Operations	Concentration on Remedial Work- High Risk Areas	Due to resource limitations currently compliant regulatory areas may be developing underlying issues leading to future PSA non-compliance due to attention being focused on obvious high risk areas.	QA	Head of A&C	3>4	3	12	Mitigate	QA activity in Regulatory departments. QA activity is prioritised by risk. Currently meeting all Registration, Education and 3 out of 5 FTP standards. More robust first line checks in place in FTP, and EDU & in dev for REG. Only highest priority risk areas are evaluated due to decreased resource. Unified Assur Framework embedded makes it less likely to miss actionable items. Increased Risk awareness. Ongoing dev work w/ Reg first line checks.	Head of A&C	Current	2>3	2>3	9	Aug/Sept 2024	4	Measured	Continue building Risk culture. Future development of Reg Quality Team Light touch Edu FLCs in Sept 24
QA	QA3	Operations	Focus on traditional areas of failure distracts from new areas of risk	Due to prioritisation bias, some underlying risk areas may be under examined, leading to subsequent non compliance via under developed processes. Regulation missing from description- non regulatory depts too.	QA	Head of A&C	3>4	3	12	Mitigate	Validated risk based prioritisation process, with ELT challenge on areas less focused on. Formal risk assurance workplan, incorporating three lines approach. Prioritisation with Regulatory dept heads, and output of previous QA activity considered as part of prioritisation. IA and QA activities aligned. Quarterly R&A meetings.	Head of A&C	Current	2>3	2>3	9	Aug/Sept 2024	4	Measured	Ad hoc meetings w/ HoDs, can meet quarterly
QA	QA4	Operations	No capacity for additional scope	Resource risk impacts being unable to meet additional requests for further spread of work	QA	Head of A&C	3>4	3>4	16	Mitigate	Potential for Scope to be amended for prioritised activities. Head of Q & C status on compatible level with colleagues. Transparency of UAF with ARAC & ETC, ELT aware of resource constraints.	Head of A&C		2>3	3	9	Aug/Sept 2024		Measured	
QA	QA5 NEW (RPD)	Operations	Failure to identify significant trends in Feedback / service complaints.	Feedback and service complaints are insufficiently analysed to provide actionable insight to the business teams around the organisation, to facilitate improvement; a) Legacy IT system, b) single point of failure (person risk) c) resource to update system whilst maintaining service.	Service & Complaints	Head of A&C	4	3>4	16	Mitigate	Monthly report of high level complaint themes to ELT, flagging repeat issues. Experienced S&C Mgr and back up cover. Experienced F&C manager w/ HCPC history. Use of insight from legacy to identify risk. If serious risk identified, can be raised to Serious Event Reporting. Formal feedback re: complaints in real time	Head of A&C	Sept 2025?	4	2>3	12	Aug/Sept 2024	4		Project to upgrade software solution to track and respond to complaints around the organisation planned for next FY. Try to avoid MVP. Web form/ auto process for feedback & complaints, combine w/ FTP feedback & complaints? Serious event report w/ CISRO Monthly meeting w/ CO, Head of A&C, & Aveen Identifying trends Staff awareness for webform
QA	QA6 (NEW RPD)	Operations	Organisational failure to respond to significant trends in Feedback / service complaints.	Failure to solicit sufficient and timely response to Feedback or complaints results in inaction by the organisation resulting in reputational damage	Service & Complaints	Head of A&C	4	4	16	Mitigate	F&C mgr sends weekly list, sent to Regulatory mgrs., ELT minus CEO F&C mgr reviews key responses, additional checks through Zoe/Bernie (all MP complaints reviewed by F&C mgr) F&C mgr liaises w/ HoDs	Head of A&C, F&C Mgr	Dec-24	4	4	16				Responding to complaints as part of JD/objectives Structural supports during departmental changes to mitigate risk
QA	QA7 (NEW RISK)		Insufficiently robust feedback data flow	Failure to pass on feedback & complaints to F&C mgr, or in a timely manner		Head of A&C	4	3	12	Mitigate	Staff awareness, HoD ownership of actioning feedback & complaints FTP- Nexus allocates unactioned emails to managers after 5 working days	Head of A&C		4	3	12				F&C mgr awareness article for employees & biweekly staff comms

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REG & CPD	61 REG2	Public Protection	Registrant Fraud	Public protection issues will lead to non-compliance to PSA standards and affect the reputation of HCPC due to fraudulent information being used in registration or renewal applications.	Registration and CPD	Head of Registration	4	2>4	16	Mitigate	Certification of documents, matched to Education provider passlists, Financial audits, system audit trails. Policy and procedures supported by internal quality audits. International verification processes i.e. previous employers, regulatory bodies and Education providers validated. Plagiarism prevention measures being monitored	Head of Registration	Ongoing	4	1>3	12	Aug/Sept 2024	4		Increasing automation, online services and improved business rules, incl passlist matching in short to medium term. Intl apps seeing plagiarism (get Turnitin) project. Automation of ID and address verification, not in person on site.
REG & CPD	62 REG3	Operations	System Failure	A technical failure of the online registration system will impact process registrations and renewals due to an increase in the use of the online application process. This includes upgrades of all potentially related systems.	Registration and CPD	Head of Registration	4	4	16	Mitigate	External IT support contracts. Well trained in house IT employees. Effective project management of new product delivery. Option for down time mgmt in place, typically 3 hrs or so. Messaging to public when technical impacts are occurring to manage expectations.	Head of Registration	Ongoing	4>3	3>4>3	9	Aug/Sept 2024	12		Improved business change continuity process in place. Single Platform? Review of priorities in BC plan
REG & CPD	65-b REG6	Operations	Sustainability of Current Working Practices - employee availability	Retention of trained, effective employees in current market may impact processing rates.	Registration and CPD	Head of Registration	4	4	16	Mitigate	Regular contact with employees. Introduce hybrid working. HCPC Health and wellbeing initiatives. Introduce Online applications, implementation cloud based contact centre telephony. Review operating model, roles etc. New operating model, online, specific team functions in place July 1st 2024. 6 week temp to perm process but number of vacant positions to be recruited to. New Pay structure April 2023 may assist in retention of RA's. (KPI's being met, suggesting effective even with larger volumes)	Head of Registration & Head of HR	Ongoing	4	3>4	16	Aug/Sept 2024	6>8		Fully used controls of processes and functionality of CRM, validation of outcomes. New digital strategy implementation. Formalize new Operating model. More automation, less data input to lower impact post mitigation. Internal QA processes to be staffed. (July 2024)
REG & CPD	REG14	Operations	Capability	Experience, skills & knowledge of workforce; and process documentation and guidance does not match current requirement of business or match stakeholder expectations resulting in missed opportunities and KPI's.	Registration and CPD	Head of Registration	4	4	16	Mitigate	Trialling more specialist teams focused on covering core areas. UK, International, Call Handling. Developing more detailed guidance on core areas. Ongoing core activity training and upskilling of engaged employees, with expanded career opportunities and potential progression. Formalise new roles (and skills) in New Operating Model, structure in place but ten vac to be filled.	Head of Registration	Apr-24	4	2>3	12	Aug/Sept 2024	4		External reqmts for areas where no resource available. New operating model. Updating documentation as changed. Specialist teams and SME's to cover key risk areas, with review of assessment etc, feedback to Ptnrs.

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REG & CPD	REG15	Operations	Capability	Registration Partners make incorrect, or unsupportable recommendations without internal challenge.	Registration and CPD	Head of Registration	4	3	12	Mitigate	Appeals mechanism as a flag of error, partner training every two years. Any appraisal mech would need to be centralised. Any appealable decision by Ptnr should be assessed by Reg Mgr. Typically checking rejections rather than accept decisions. New Record of Assessment, New Course Information Form (Autumn 2023). New Reg Officer position in new model to rww Ptnr decision making, and Quality team in Reg, CPD assessment process and documentation being reviewed, with QA Team.	Head of Registration, Partner Lead		4	2>3	12	Aug/Sept 2024	4		Potential assessor decision appraisal in future via QA? Should a percentage of positive decisions also be checked, as putting someone on the register is also a risk to be considered. Determine what info rgrd in record of assessment form. More detail required for supporting info around accept decisions. Cross Dept workshops and learning to locate common improvement mechanisms
SR	SR1 (formerly PUSR2)	Reputation	Strategic relationships with strategic partners incorrectly assigned weight and resource.	Strategic Relationships: incorrect level of engagement with Strategic Partners? Appropriately balanced and filtered. Internal & external aspects Incorrect application of stakeholder map and prioritisation	Comms, Engagement & Public Affairs	Exec Dir Corporate Affairs	4	4	16	Mitigate	Strategic Relationship Lead Luther providing support & expertise & Prof Body quarterly mtgs to filter or target work Relationship Mgmt Model Prof body mtgs. Q4 Rvw of process Priority areas targeted, EMG. Regional aspects covered by 4 home country reps, input from Strat Lead and discussion. Prof bodies re-prioritised recently. Some bespoke work with particular profs. Sense check with home country leads pre meeting with Govmt bodies	Strategic Relationships Lead	Ongoing but progress mtg end Q4	4	2	8	Aug/Sept 2024	8		Improve Rel model and expand, resourcing level consideration. Less V High level engagement use (ELT).
SR	SR2 (formerly PUSR3)	Reputation	Impact of poor stakeholder relationships	Poor Professional body relationships with HCPC may impact trust of the regulator by registrants or other stakeholders	Comms, Engagement & Public Affairs	Exec Dir Corporate Affairs	4	4	16	Mitigate	Strategic Relationship Lead Prof Body quarterly mtgs to filter or target work Relationship Mgmt Model Prof body mtgs Collaborating with Prof bodies to design & deliver material. (Prof Body Forum, grown from 8 to 30 over last year or so) 11 of 15 profs at last mtg, 25 individuals approx. quarterly. Fee change supported by prof bodies	Strategic Relationships Lead	Ongoing but progress mtg end Q4	3	3	9	Aug/Sept 2024	6		Improve Rel model and expand, resourcing level consideration