
Health Professions Council Meeting – 11 December 2008

RISK REGISTER UPDATE

Executive summary and recommendations

Introduction

The risk register is kept under review by all risk owners and is routinely updated twice a year. The risk register is considered by the Audit Committee twice yearly at its meetings February and September. The latest copy was noted by the Audit Committee at their meeting on 26 September 2008 and their comments updated in the Register – refer minutes Item 14.08/63.

Decision

The Council is asked to approve the latest Risk Register update.

Background information

none

Resource implications

Various – refer mitigations in the Risk Register

Financial implications

Various operational costs are incurred relating to the risk mitigations. These are embedded in departmental budgets. Examples include; insurance, data backups, data and physical security costs, audit costs and professional advice sought.

Appendices

Appendix one - Risk Register

Appendix two - Glossary

Date of paper

19 November 2008

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2007-12-04	a	CNL	PPR	Risk Register	Draft DD: None	Public RD: None

HPC Risk Register Glossary

The risk assessment replaces the last HPC Risk Assessment completed. This was dated June 2007.

Category

Risks have been clustered together to aid analysis.

Description

A discrete risk.

Risk owner

The risk owner is the Council, Committees, President, Chief Executive, Executive Management Team, Director or Manager who is primarily responsible for assessing and managing the risk.

Mitigation

Mitigation is the solution that HPC uses to reduce the risk. Up to three groupings of mitigations have been identified.

Significant

Risks are classified into three categories:

High – occurrence would impact HPC’s operations and budget substantially= Red

Medium – occurrence would impact HPC’s operations and budget significantly= Amber

Low – occurrence would impact HPC operations and budget moderately= Green

The risk rating is a net risk rating i.e. an assessment of the gross risk less the mitigations in place to manage it.

Probability

High – probability is assessed as the likelihood of the risk occurring within three months = Red

Medium –likely within one year = Amber

Low – likely after more than one year = Green

	Significance Level	Probability/timing
High	Substantial	Within three months
Medium	Significant	Within one year
Low	Moderate	Over one year

APPENDIX ONE - Top HPC Risks

RISK ASSESSMENT September 2008

Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Mitigation I	Mitigation II	Mitigation III	SIGNIFICANCE March 2008	PROBABILITY March 2008
13.3 Tribunal exceptional costs, FTP, Registrations and CPD Appeals	FTP Director	Quality of legal advice	Quality of operational processes	Legal Insurance cover for lawyer costs (rather than tribunals) costing between £125k and £250k	High	High
12.1 Judicial review of Rules, Standards & Guidance	Chief Executive	Consultation. Stds determined by PLG's. Agreement by Council.	Appropriate legal advice sought	-	High	Medium
4.1.0 Member recruitment problem (with the requisite skills)	President	Skills audit. Preparation of a detailed role description for restructured Council and communications strategy for potential applicants	Use of the Office of Public Appointments Commission to advertise and recruit new members	Use of the Office of Public Appointments for advice (on recruitment of the requisite skills)	Medium	Medium
7.3 Inability to manage Education Provider (EP) visits	Director of Operations, Head of Education	Adequate resourcing, training and visit scheduling	Approvals & Monitoring processes	Temporary staff hire to backfill or clear wk backlogs	Medium	Medium
13.1 Legal cost over-runs	FTP Director	Processes and strict arrangements with law firm suppliers	Professional Indemnity Insurance	Good process management for arranging hearings	Medium	Medium
14.3 Changing/evolving legal advice rendering previous work inappropriate	Policy & Stds Director	Use of well-qualified legal professionals. Regular reviews.	Legal advice obtained in writing.	Appropriately experienced and trained members of Policy team and others eg HR.	Medium	Medium

17. 2	Paper record Data Security	Head of Business Improvement and Facilities Manager	Use of locked document destruction bins in each dept. Use of shredder machines for confidential record destruction in some depts eg Finance.	Data Protection agreements signed by the relevant suppliers. Dept files stored onsite in locked cabinets.	Regarding Reg Appln forms processing, employment contract includes Data Protection Agreement	Medium	Medium (Reg Assessor registered mail still to arrange)
17. 3	Data held by Third Parties	Director of Ops and Director of IT	Data Protection/Controller agreements signed by the relevant suppliers. Use of electronic firewalls by suppliers.	Use of locked Tape Archive boxes and sign out procedures.	DSL access LISA via secure VPN and password security. Only sample set of data held by DSL. Print UK password encryption. Peladon access using remote access tool. Electral Reform Society data is password protected and encrypted.	Medium	Medium (Servicepoint tamper proof boxes still to arrange)

APPENDIX ONE - THE HEALTH PROFESSIONS COUNCIL

RISK ASSESSMENT September 2008

Guide - look for Risks rated as Medium or High PROBABILITY (of occurrence in next 12 mths). Then for those ones, look for SIGNIFICANCE (Impact) ratings of Medium or High. SIGNIFICANCE is Net i.e.Gross Risk less mitigations in place.
 "Premises" in this document covers 184 Kennington Park Rd, 20 Stannary St and 22-26 Stannary St.

R ef	Category	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Mitigation I	Mitigation II	Status	Mitigation III	Sta tus	Signifi cance Septe mber 2008	Probabi lity Septem ber 2008	Signifi cance March 2008	Proba bility March 2008
1	Strategic	1.1 HPC fails to deliver Order in Council (OIC) Links to 7.1-7.5, 8.1-8.3, 10.4, 10.5, 11.4, 15.9	Council	Delivery of HPC Strategy	Publication of Privy Council Annual Report	TBC	-	-	High	Low	High	Low
		1.2 Unexpected change in UK legislation Links to 2.2, 15.14	Chief Executive	Relationship with Government depts	Lobbying	O	-	-	Medium	Low	Medium	Low
		1.3 Incompatible OIC and EU legislation	Chief Executive	Monitoring of EU directives e.g. Professional Qualifications Directive	Membership of Alliance of UK Health Regulators on Europe (lobby group)	O	-	-	Low	Medium	Low	Medium
		1.4 CHRE conflict	Chief Executive	HPC President sits on the CHRE Council	Communications	O	-	-	Low	Low	Low	Low
2	Operations	2.1 Inability to occupy premises or use interior equipment	Facilities Mger	Invoke Disaster Recovery/Business Continuity plan	Commercial Combined insurance cover (fire, contents, terrorism etc)	O	-	-	Low	Low	Low	Low
		2.2 Rapid increase in registrant numbers Links to 1.2	Chief Executive and Director of Operations	Scaleable IT systems/registration	22-26 Stannary St fit out.	O	Influence the rate at which New Professions are regulated	-	Low	Low	Low	Low

		2.3	Unacceptable service standards	Director of Operations	ISO 9001 Registration, Process maps, well documented procedures & BSI audits	Hire temporary staff to clear service backlogs	O	Market Research surveys to prioritise service offerings	-	Low	Low	Low	Low
		2.4	Links to 9.1, 10.4 Postal or telephone disruption	Facilities Mger	Website, newsletter & messages	Invoke Disaster recovery plan	O	Collection of >80% income fees by DD	-	Low	Low	Low	Low
		2.5	General shutdown of transport systems	Facilities Mger	contact staff via disaster recovery plan process	Make arrangements for staff to work at home if possible	-	-	-	Low	Low	Low	Low
		2.6	Inability to accommodate HPC employees Links to 5.2	Facilities Mger	Temporary premises rented	Phase 2 22-26 Stannary St fit out.	C	Ongoing Space planning	-	Low	Low	Low	Low
3	Communi cations	3.1	Failure to inform public Article 3 (13)	Director of Comms	Delivery of communications strategy	AGM, Biennial awareness survey	TBC	-	-	Low	Low	Low	Low
		3.2	Loss of support from the professional bodies	Director of Comms	Delivery of HPC Strategy	Delivery of communications strategy	O	Regular Listening Events held	-	Low	Low	Low	Low
		3.3	Inability to inform stakeholders following crisis	Director of Comms	Invoke Disaster recovery plan	Mailing address details kept as current as possible in netregulate	-	-	-	Low	Low	Low	Low
4	Corporate Governan ce	4.1	Council inability to make decisions	Secretary to Council	Regular meetings, agendas and clear lines of accountability between Council and committees	Well researched and drafted decision papers at meetings	-	Attendance by external professionals as required	-	Low	Low	Low	Low
		4.2	Links to 4.4 Council members conflict of interest	President	Disclosure of members' interests to the Secretariat	Disclosure of conflict of interest in the Annual Report & on the HPC website	C	Member induction and training	O	Low	Low	Low	Low

4.3	Poor decision-making eg conflicting advice or conflicting advice and decisions	President	Well-researched & drafted decision papers, Clear lines of accountability and scheme of delegation	President's involvement in the appointments process for lay members, induction and relevant training		Attendance by external professionals, as required.		Low	Low	Low	Low
4.4	Failure to meet Council/Committee quorums	Secretary to Council	Clear communication of expectations of Councillors duties upfront	Adequate processes notifying Council & Committee members of forthcoming meetings	C	Committee secretary's and chairmen advised that inquorate meetings must not proceed	-	Low	Low	Low	Low
4.5	Links to 4.1 Members' poor performance	President	President's annual appraisal of Council members	Training & support at Away Days and Inductions	-	Removal under Sch 1, Para 9(1)(f) of the HPO 2001	-	Low	Low	Low	Low
4.6	Poor performance by the President	Council	Standing Orders	Power to remove the President under Sch 1, Article 12(1) C of the HPO 2001	C	-	O	Low	Low	Low	Low
4.7	Poor performance by Chief Executive	President	Performance reviews and regular "one to ones" with the President	Contract of Employment		-		Low	Low	Low	Low
4.8	Improper financial incentives offered to Council members/employees	President and Chief Executive	Gifts policy	Council member code of conduct	O	Induction training re:adherence to Nolan principles	-	Low	Low	Low	Low
4.9	Health & Safety of Council members	Secretary to Council	Personal Injury and Travel insurance	Restricted access to the building site (22/26 Stannary St)		Road safety policy (for vehicle drivers) with training to follow		Low	Low	Low	Low
4.10	Links to 6.3, 11.5 Member recruitment problem (with the requisite skills)	President	Skills audit. Preparation of a detailed role description for restructured Council and communications strategy for potential applicants	Use of the Appointments Commission to advertise and recruit new members		Use of the Office of Public Appointments for advice (on recruitment of the requisite skills)		Medium	Medium	Medium	Medium

		Links to 6.1, 11.13											
		4.1 1 Expense claim abuse by members	Secretary to Council	Members Code of Conduct (public office)	Clear and comprehensive policies posted on the Council member Extranet and made clear during induction			Budget holder review and authorisation procedures		Medium	Low	Medium	Low
5	IT	5.1 Software Virus damage Links to 2.3, 10.2	Director of IT	Firewalls and anti-virus SW checks run	Adherence to IT policy, procedures and training	O		Regular externally run security tests and probes	O	Low	Low	Low	Low
		5.2 Technology obsolescence, (HW or SW) Links to 2.6, 10.2	Director of IT	Accurate asset records and technology refresh strategy	Employ mainstream technology with recognised support and maintenance agreements	O		Anually review IT technology strategy	-	Low	Low	Low	Low
		5.3 IT fraud or error Links to 10.2 and 17.1	Director of IT	Adequate access control procedures maintained. System audit trails.	Regular, automatic password changes. External reviews. Daily backups.	O		Regular externally run security teats and probes	O	Medium	Low	Medium	Low
6	Partners	6.1 Inability to recruit and/or retain suitable Partners Links to 4.10, 11.3, 7.3, 7.5	Partner Manager	Sound recruitment strategy. Training	HR Strategy: Appropriate compensation package in place.	O		Regular appraisal system	-	Low	Low	Low	Low
		6.2 Incorrect interpretation of law and/or SI's resulting in CHRE review	Director of FTP & Director of Operations (Visitors)	Training	Legal Assessors advice availability	O		Regular appraisal system	-	Low	Low	Low	Low
		6.3 Health & Safety of Partners Links to 4.9, 11.5	Partner Manager	Personal Injury and Travel insurance. Liability Insurance	Road Safety policy (for vehicle drivers) with training to follow			Restricted access to the building site (22/26 Stannary St)		Low	Low	Low	Low
7	Approvals & Monitoring & CPD	7.1 Non-detection of low education providers standards Links to 1.1	Director of Operations Head of Education	Annual Approvals & Monitoring processes	Complaints about an approved programme process	-	-	-	Medium	Low	Medium	Low	

		7.2	Education providers refusing visits or not submitting data	Director of Operations Head of Education	Legal powers (HPO 2001)	Delivery of Education Dpt supporting activities (e.g. publications, website and presentations)	-	-	-	Medium	Low	Medium	Low
		7.3	Links to 1.1 Inability to manage Education Provider (EP) visits Links to 1.1, 6.1, 11.2 & 11.3	Director of Operations Head of Education	Adequate resourcing, training and visit scheduling	Approvals & Monitoring processes	-	Temporary staff hire to backfill or clear work backlogs	-	Medium	Medium	Medium	Medium
		7.4	Loss of support from Educational Provider	Chief Executive	Delivery of Education strategy (e.g. supporting activities such as publications, website and presentations)	Partnerships with Visitors and professional groups.	-	-	-	Low	Low	Low	Low
		7.5	Links to 1.1, 14.2 CPD processes not effective	Director of Operations	Well documented processes	Appropriately trained members of the registrations team	-	Monitor and regular feedback to the Education & Training Committee	-	Low	Low	Low	Low
			Links to 1.1										
	Project Management	8.1	Fee change processes not operational by April 2009 Links to 1.1, 15.3 Links to 1.1, 15.3	Director of Finance	Project progress monitored by EMT	Apply HPC's project management methodology		Maintain regular informal contact with Privy Council staff throughout all stages of the project		High	Low	High	Low
		8.2	Failure to regulate a new profession or a post-registration qualification as stipulated by legislation Links to 1.1, 15.3	Director of Operations Project Manager Head of Registrations, Director of Policy & Standards	Project progress monitored by EMT	Apply HPC's project management methodology		Maintain regular informal contact with Privy Council staff throughout all stages of the project		Medium	Low	Medium	Low
		8.3	Legal challenge to equality and diversity scheme	Equality and diversity project lead	Appropriate legal and professional advice sought in scheme development	Consultation with external organisations		Oversight by project team and EMT		Low	Low	Low	Low

		8.4	HPC added to organisations which are legally required to publish a scheme but no scheme is published	Equality and diversity project lead	Equality and diversity project plan	Scheme publication by December 2007			Low	Low	Low	Low
		8.5	Stannary St project - Phase Two	Facilities Manager	Detailed planning, design and quantity surveying of costs	Project progress monitored by EMT	Apply HPC's project management methodology		Medium	Low	Medium	Low
		8.6	Online Renewals Project	Director of Operations, Project manager		Project progress monitored by EMT	Apply HPC's project management methodology		Medium	Low	Medium	Low
		8.7	Practitioner Psychologists Onboarding	Director of Operations, Project Manager		Project progress monitored by EMT	Apply HPC's project management methodology		High	Low	High	Low
		8.8	Bichard Project	Director of Fitness to Practice, Project Manager		Project progress monitored by EMT	Apply HPC's project management methodology		Low	Low	Low	Low
9	Quality Management	9.1	Loss of ISO 9000 Certification Links to 2.3, 10.3	Director of Operations, Head of Business Improvement	Regular & internal audits	QMS standards applied across HPC	Management buy - in		Low	Low	Low	Low
10	Registration	10.1	Customer service failures Links to 11.1, 11.2	Director of Operations, Head of Registration	Accurate Manning level forecasts	Adequate manpower resourcing & training	Supporting automation infrastructure eg call centre systems, LISA system enhancements, registration re-structure		Low	Low	Low	Low

		10.2	NetRegulate Registration system failure Links to 5.1-5.3 and 17.1	Director of IT	Effective backup and Recovery procedures	Third party maintenance and support contract	O	Disaster recovery tests	O	Low	Low	Low	Low
		10.3	Inability to detect fraudulent applications Links to 9.1, 17.1 and 17.2	Director of Operations, Head of Registration	Financial audits, System audit trails	Policy and procedures supported by internal quality audits & specialised external Risk Management guidance	O	Regular, automatic password changes	-	Medium	Low	Medium	Low
		10.4	Backlogs of registration and GP applns Links to 1.1, 2.3	Director of Operations, Head of Registration	Adequate staffing levels maintained to clear backlogs, based on accurate demand-forecasting	Process streamlining	O	-	-	Low	Low	Low	Low
		10.5	Mistake in the Registration process leading to liability for compensation to Registrant or Applicant	Director of Operations, Head of Registration	Financial audits, System audit trails	Professional Indemnity insurance. Excess £2.5K. Limit £1M. (Doesn't cover misappropriation of funds)		Policy and procedures supported by ISO quality audits and process controls/checks		High	Low	High	Low
11	HR	11.1	Loss of key HPC employees (person cover risk)	President, Chief Executive and EMT	Committee chairmen cover for President loss, President and EMT cover for CE loss until interim appointment made	Cross training (partial or full) and process documentation	O	Chief Executive succession plan held by HR Director. Succession planning generally.	TBC	Medium	Low	Medium	Low
		11.2	High turnover of employees Links to 11.3	HR Director	Remuneration and HR strategy	Regular performance reviews	O	Exit interview analysis	-	Low	Low	Low	Low
		11.3	Inability to recruit suitable employees Links to 4.10, 6.1, 11.2, 11.8	HR Director	HR Strategy and adequate resourcing of the HR dept	Careful specification of recruitment adverts and interview panel selection	O	Hire skilled temporary staff in the interim	-	Low	Medium	Low	Medium

		11.4	Lack of technical and managerial skills to delivery the strategy Links to 1.1	Chief Executive	HR strategy and goals and objectives (buy in the skills v staff upskilling on the job v training)	Training needs analysis & training delivery.	TBC	Some projects or work initiatives delayed or outsourced	O	Low	Medium	Low	Medium
		11.5	Health & Safety of employees Links to 4.9, 6.3	Chief Executive	Health & Safety Training, policies and procedures	H&S Assessments (Lawrence, Webster Forrest).	O	Personal Injury & Travel insurance	-	medium	Low	Low	Low
		11.6	High sick leave levels	EMT	Adequate staff (volume and type) including hiring temporary staff	Return to work interviews and sick leave monitoring	O	Regular progress reviews	-	Low	Medium	Low	Medium
		11.7	Employee and ex-employee litigation	HR Director	Regular one on one sessions between manager and employee and regular performance reviews.	HR legislation and HR disciplinary policies	O	Compromise agreements	-	Low	High	Low	High
		11.8	Employer/employee inappropriate behaviour Links to 11.3	HR Director	Whistle blowing policy	Other HR policy and procedures	C	Employee Assistance programme	-	Low	Low	Low	Low
		11.9	Non Compliance with Employment legislation	HR Director	HR Strategy	Obtain legislation updates and legal advice		HR policies and Manager training		Low	Low	Low	Low
12	Legal	12.1	Judicial review of Rules, Standards & Guidance Links to 1.2	Chief Executive	Consultation. Stds determined by PLG's. Agreement by Council.	Appropriate legal advice sought	O	-	-	High	Medium	High	Medium
13	Fitness to Practise	13.1	Legal cost over-runs Links to 13.4, 15.2	FTP Director	Processes and strict arrangements with law firm suppliers	Professional Indemnity Insurance	C	Good process management for arranging hearings	-	Medium	Medium	Medium	Medium
		13.2	Legal challenge to HPC operations	Chief Executive	Legal advice and ISO	Communications	O	-	-	Low	Low	Low	Low

		13.3	Tribunal exceptional costs, FTP, Registrations and CPD Appeals	FTP Director	Quality of legal advice	Quality of operational processes	O	Legal Insurance cover for lawyer costs (rather than tribunals) costing between £125k and £250k	O	High	High	High	High
		13.4	Rapid increase in the number of tribunals and resultant legal costs Links to 13.1	FTP Director	Accurate and realistic budgeting	Resource planning	O	-	-	Low	Medium	Low	Medium
		13.5	Witness non-attendance	FTP Director	Witness summons	Witness support programme	O	-	-	Low	Medium	Low	Medium
		13.6	Employee/Partner physical assault by Hearing attendees	FTP Director	Advice sought from the Police	Adequate facilities security		Periodic use of security contractors and other steps		Medium	Low	Medium	Low
		13.7	Registration Appeals	FTP Director & Director of Operations	Training and selection of Registration Assessors, so reasoned decisions are generated	Effective processes and criteria for arranging hearings and cases	O	-	-	Low	Low	Low	Low

14	Policy & Standards	14.1	Incorrect process followed to establish stds/guidance/policy eg no relevant Council decision	Policy & Stds Director	Legal advice sought on processes	Appropriately experienced and trained members of Policy team.		Quality mgt system & processes		Low	Low	Low	Low
		14.2	Inappropriate stds/guidance published eg stds are set at inappropriate level, are too confusing or are conflicting	Council/Committees	Use of professional liaison groups, and Council and committees including members with appropriate expertise	Appropriately experienced and trained members of Policy team.		Consultation with stakeholders & legal advice sought		Low	Low	Low	Low
		14.3	Changing/evolving legal advice rendering previous work inappropriate	Policy & Stds Director	Use of well-qualified legal professionals. Regular reviews.	Legal advice obtained in writing.		Appropriately experienced and trained members of Policy team and others eg HR.		Medium	Medium	Medium	Medium

15.6	Inability to collect from debtors	Finance Director	Collection via Direct Debit for >80% of fees income	Registrant Debtors policy compliance.	-	Request new DD details from Registrants when informed by the bank that the Registrant's DD was rejected. Periodic reviews of Misc Debtors.	-	Low	Low	Low	Low
	Links to 15.1										
15.7	Registrant Credit Card record fraud/theft	Finance Director	Daily credit card payment reconciliations in Finance dept - Streamline to Netregulate and Bank records.	Tight procedures to retrieve sensitive paper records from archive, rationalise records kept and retain sensitive current year records with security tagging and in compliance with cr card record storage stds.		Addition of Worldpay for payments (online cr card authorisation and payments received)		Medium	Low	Medium	Low
	Links to 5.3										
15.8	Total receipt of correct fee income	Finance Director	Netregulate controls in place (charging & receipts)	Regular revenue reconciliations between Netregulate and SAGE			-	Low	Low	Low	Low
15.9	Mismatch between Council goals & approved financial budgets	Chief Executive	Adequate quantification of the budgetary implications of proposed new initiatives	Close and regular communication between the Executive, Council and its Committees.	O	Spending prioritisation criteria	-	Low	Low	Low	Low
	Links to 1.1										
15.10	Unauthorised payments to organisations	Finance Director	Purchase Order approval compliance	Signatory list maintenance	C	Approved and one-off supplier processes		Low	Low	Low	Low
	Links to 5.3										
15.11	Unauthorised payments to personnel	Finance Director	Expense claim processes	Signatory list reviews	C	Professional Indemnity & fraud insurance	-	Low	Low	Low	Low
	Links to 5.3										
15.12	Unauthorised removal of assets (custody issue)	Facilities Mger	IT asset labelling & asset logging (issuance to employees)	Fixed Asset register itemising assets. Job exit procedures (to recover HPC laptops etc)	C	Computer insurance	-	Low	Low	Low	Low

15.13	Mis-signing of cheques (forgery)	Finance Director	Regular reviews of cheque signatories against invoices paid by cheque.	Monthly bank reconciliations	C	Minimal use of manual chqs. Two signatories on cheques.	-	Low	Low	Low	Low
	Links to 5.3										
15.14	Non compliance with Privy Council/FReM	Finance Director	Periodic reviews of website updates. Technical updates from CA firms. HM Treasury rulings sought.	Employee training		Reference materials held in Finance Dept including FReM.		Low	Low	Low	Low
	Links to 1.2										
15.15	Qualified opinion received by the Auditors on the Annual Financial Statements	Finance Director	Internal control compliance	FReM compliance		-		Low	Low	Low	Low
	Links to 1.2										
15.16	Late submission of the Annual Report, beyond sector standards	Secretary to Council	Upfront agreement on the Year End and Annual Report reporting process dates	Process management				Low	Low	Low	Low
	Links to 15.1										
15.17	VAT compliance	Finance Director	Professional tax advice sought including regarding deregistration process	Tax provisions made				Low	Low	Low	Low
					HMRC website periodic reviews. Employee training (CPD hours)						
15.18	PAYE/NI compliance	Finance Director	Professional tax advice sought including status of CCM's and partners	Tax provisions made. PAYE Settlement Agreement sought (via Baker Tilly)		HMRC website periodic reviews. Employee training (CPD hours)		Medium (amts involved)	Low	Medium (amts involved)	Low
15.19	Corporate Tax compliance	Finance Director	Professional tax advice sought eg Corporate Tax Return preparation and	Tax provisions made				Low	Low	Low	Low

				filing.								
16	Pensions	16.1	Under-funded pension liabilities (CPSM Retirement Benefits Scheme*) Links to 15.1, 15.5 Section 75 (Pensions Act 1995) liability resulting if the number of active members of the Capita Flexiplan scheme drops to zero Links to 15.1, 15.5	Finance Director	Benefits secured by insurance policies issued by the Scottish Life Assurrance (SLA)	Periodic review of the actuarial valuation of assets of the fund to cover pension liabilities.	O	Specialist pensions legal advice sought	Low	Low	Low	Low
		16.2	Capita Flexiplan funding liability resulting from new Scheme Specific Funding Standard (SSFS) and insufficient Pensions Capital to meet fund obligations	Finance Director	Notional membership by six scheme members to avoid triggering S75 liability	Employee exit procedure modified so when any of the notional members resign, a replacement member is enrolled in the Flexiplan scheme	-	-	Low	Low	Low	Low
		16.3	Capita Flexiplan funding liability resulting from new Scheme Specific Funding Standard (SSFS) and insufficient Pensions Capital to meet fund obligations	Finance Director	Monitoring of Actuarial valuation reports on the Pension scheme	Professional Trustee (Entrust) actions to rebalance the pension investments towards less market-volatile securities		Entrust (professional trustee) and employer's group actions to wind up the scheme and distribution any net surplus	Low	Low	Low	Low
17	Data Security	17.1	Electronic record Data Security Links to 5.3	Director of IT	Employment contract includes Data Protection Agreement	Adequate access control procedures maintained. System audit trails.		Laptop security encryption and VPN access.	Medium	Low	Medium	Low
		17.2	Paper record Data Security Links to 15.7	Head of Business Improvement	Use of locked document destruction bins in each dept. Use of shredder machines for confidential record destruction in some depts eg Finance.	Data Protection agreements signed by the relevant suppliers. Dept files stored onsite in locked cabinets.		Regarding Reg Appln forms processing, employment contract includes Data Protection Agreement	Medium	Medium (Reg Assessor registered mail still to arrange)	Medium	Medium (Reg Assess or registered mail still to arrange)

						Digital Steps Ltd (Netregulate developer) access Netregulate via a secure VPN and password security. Only sample set of data held by DSL. Print UK password encryption. Peladon access using remote access tool. Electoral Reform Society data is password protected and encrypted.					
17.3	Data held by Third Parties	Director of Ops and Director of IT	Data Protection/Control agreements signed by the relevant suppliers. Use of electronic firewalls by suppliers.	Use of locked Tape Archive boxes and sign out procedures.			Medium	Medium (Service point tamper proof boxes still to arrange)	Medium	Medium (Service point tamper proof boxes still to arrange)	
17.4	Data received from Third Parties	Director of Ops, and Director of FTP	Read only, password protected access by a restricted no of FTP employees to electronic KN data.	Registrant payments taken in compliance with Payment Card Industry (PCI) Security standards ie with quarterly PCI testing.		Ensure third party data providers eg professional bodies provide the data password protected/encrypted/door to door courier/registered mail/sign in sign out as appropriate.	Medium	Low	Medium	Low	

* The Fund wind up is being managed by Capital Trust Ltd (formely FPS). Since 1995, eligible employees have belonged to a new scheme - Flexiplan 1.