Council

24 September 2020

hcpc health & care professions council

Chief Executive's report on organisational performance – July 2020

Executive Summary

This paper provides the Council with updates on the organisation's performance since the July 2020 Council meeting. It includes specific projects and activities for the Council to note, stakeholder engagement activity, an update on COVID temporary registration and assessment of performance.

Background data to the KPI performance is available to Council and on our website for reference.

Previous consideration	This is a standing item, considered at each Council meeting.
Purpose of report	The Council is asked to discuss the paper and provide any feedback on future format and information to be included.
Next steps	The next report will be received in December 2020.
Strategic priority	The Corporate Strategy for 2021-26 is in development with Council excepted to agree a draft for consultation at its September 2020 meeting.
Risk	This report is relevant to all strategic risks and risk appetite.
Financial and resource implications	None as a result of this paper.
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Chief Executive's Performance Report

September 2020

Contents

1. Chief Executive's agenda overview – 24 September 2020

Corporate Strategy

Following targeted stakeholder engagement to refine the proposed strategy, I am seeking Council's agreement to launch a full consultation to comprehensively 'test' the strategy with our stakeholders. An analysis of the consultation responses along with a final proposed draft strategy will be presented to Council at its December 2020 meeting for approval.

Annual report and accounts 2019-20

Our annual report was deferred from its usual July approval to September due to the impact of the pandemic. We are now ready to seek Council approval of the final draft of the audited report and accounts. Council will be asked to approve the annual report and accounts following which it will be laid in parliament.

Yearly highlight report 2020-21

Following Council feedback we have produced a more concise and targeted publication to accompany the annual report and accounts. This document has been designed with the assistance of our Communications consultants, Luther Pendragon and will the document we promote to stakeholders. The Council will be asked to approve the publication of the report.

Professionalism and prevention framework

This paper presents a developed draft of the framework following the Council's discussion in July. The Council's feedback will be incorporated into the framework and action plan for approval at the December meeting.

EDI update

Our work to improve our Equality, Diversity and Inclusion (EDI) practice remains at the front of our minds as a Senior Management Team. I am pleased that we are making good progress against our action plan and this presentation will provide the Council with an update on work since the July and the first feedback coming from our new EDI Forum. In addition, we have recruited the EDI Policy Manager role. The SMT welcomes the Council's proposal for a diverse Council Apprentice opportunity also on the meeting's agenda.

Digital transformation

The Digital Transformation Strategy needs to be reviewed and renewed on a regular basis to ensure the organisation is in the best position to exploit the latest technologies, approaches and, importantly, that the strategic needs are still relevant

FTP CMS Replacement Project high level business case - private

The new FTP case management system will form a 'test case' for the effectiveness of the principles of our Digital Transformation Strategy. This has the potential to transform our FTP productivity without the previously accepted long lead times for a major IT system. Council will be asked to conditionally approve the project spend.

2. Stakeholder engagement summary

Key work this period has included discussions with professional bodies, unions and Chief Officers on the draft corporate strategy. We held a series of workshops with employees to gain their initial feedback on the vision, values and future strategic direction. This pre-engagement has informed the draft corporate strategy for public consultation, subject to Council approval at this meeting. The Executive has also undertaken engagement with a range of stakeholders on the flexibility we are offering to former registrants on our return to practice requirements. This included sharing our intentions prior to publication. We have now published our statement, updated website content and highlighted this to registrants and employers as well as professional bodies.

It has been a busy period in relation to our public affairs activities. This has included submitting evidence to the APPG on Coronavirus, with an associated blog from our Chair as well as the response to Matt Hancock's future of healthcare speech, including the statement we published and letters to the Secretary himself and the Chair of the Health & Social Care Select Committee. We have also submitted evidence to the Health & Social Care Select Committee on their workforce burnout and resilience Inquiry and met with Dr Philipa Whitford MP to discuss her Public Interest Disclosure (Protection) Bill. I am due to meet Rachel Maskell MP to discuss our public protection work and how we have supported registrants through COVID-19.

In relation to other communications activity: we have published an up to date registrant snapshot which highlights statistical data from the Register, including profession, country, gender and application route; published the registrant e-news with updates on our advanced practice work; written to employers (Up to Standard) on regulating in the next phase; published blogs on strengthening our approach to EDI and the importance of maintaining fitness to practise as part of our SOPs consultation; and developed the next series of MyHCPC standards which starts in September.

Internal communications has supported the return to office work producing posters, an information pack, videos, intranet hub and live Q&A session for first returners as well as continuing my weekly blog. We have also progressed our engagement with registrants on EDI and hosted two workshops to better understand views and hear feedback on the strategy we are developing. The Internal Communications Specialist has also hosted a discussion on how we can celebrate EDI across the organisation, including Black History Month in December.

Our relationship with Luther Pendragon continues to be both positive and productive. The team has supported the draft corporate strategy work, producing the visuals for the document and preparing for registrant and partner workshops in October. They have also worked closely with us to develop the year in highlights which showcases our work over the last year. With Council, Luther has begun to develop the HCPC's communications objectives and priority themes and issues and the Executive will look at how these can be taken forward as part of the corporate strategy. Colleagues at Luther Pendragon continue to support on day to day media and public affairs work.

3. Regulatory Development

3.1 Regulatory reform

The Department of Health and Social Care (DHSC) has confirmed how Ministers want to take forward the legislative changes to support regulatory reform. As the DHSC has developed the work on legislative reform some practical difficulties have arisen with the proposed approach of introducing a series of thematic Section 60 Orders to cover the legislation of all of the regulators. In addition, the original timetable has been impacted by the need to prioritise responding to Covid-19.

Ministers have therefore decided to take forward the reforms on a regulator by regulator basis. Given the need to introduce the regulation of medical associate professions, this will start with changes to the GMC's legislation. We await clarification as to when HCPC's legislation will be considered. However, the Chair and I continue to press the case for HCPC having early attention.

The DHSC has confirmed their commitment to introducing a consistent legislative framework for all of the regulators. We continue to work collaboratively with the DHSC and the other regulators on the detailed work to progress the legal instructions for the legislative changes. The focus currently has been on changes to the Education and Training and Registration legislation.

At its July meeting the Council requested a summary of HCPC's priorities for regulatory reform. At a strategic level, the Executive's priorities are to have reformed legislation which:

- places a greater emphasis on supporting professionalism, while continuing to take proportionate action to manage concerns about a minority of professionals;

- provides greater autonomy to set our own operating processes and procedures, including rule making powers, to enable us to be agile when responding changes to the environment in which our registrants operate;

- ensures broadly equivalent powers to ensure consistency;

- has effective and modern governance underpinned by openness and transparency;

- ensures registrant's rights remain protected; and

- maintains the public protection imperative.

At the more granular level, in our response to *Promoting professionalism, reforming regulation* HCPC set out its priorities for legislative changes. Many of these changes are focussed on driving improvements to our handling of fitness to practise cases and enabling a more proportionate suite of options for the just disposal of FTP cases.

In the absence of any changes to secondary legislation since the consultation, these changes continue to be a priority and would be achievable if the principles outlined above are implemented. In summary they are:

A single fitness to practise committee for adjudication (combining the conduct and competence and health committees)	Combining the Conduct and Competence and Health Committees would allow allegations to be dealt with 'in the round'. Investigating Committee panels have to make an early decision about which Committee should deal with a case. This can mean that cases are subsequently cross-referred between the committees, for example, where it becomes apparent that there is no evidence of an impairment by reason of health, delaying the progress of cases unnecessarily.
Removing the requirement for a council member to Chair a registration appeal hearing	A Council member, who must not be a member of the Education and Training Committee, is required to Chair registration appeal hearings. This is contrary to the principle applied elsewhere (in the education, fitness to practise and registration processes) of separation between Council members' roles in setting policy and assuring overall performance and 'transactional' decision making in each process. It is proposed that the requirement should be removed and, in line with fitness to practise, Council members made ineligible for appointment to appeals panels. Partners would chair panels
Allowing Northern Ireland qualified solicitors to be appointed as legal assessors	Legal assessors provide advice to fitness to practise panels on matters of law and procedure. Our current Order only permits a Barrister in Northern Ireland to be appointed as a legal assessor but does not permit a Northern Ireland registered solicitor. This is an obvious omission from the legislation which it is suggested should be corrected.
Allowing fitness to practise panels the discretion to decide whether a suspension or conditions of practice order should be reviewed prior to its expiration.	All cases which result in suspension or conditions of practice orders are required to be reviewed before their expiration. In a small number of cases, a review may not serve any practical purpose. Panels should have the discretion as to whether to direct a review is necessary in each case.
Ability to issue warnings	This would allow the regulator to issues warnings and advice in cases where it has determined that there is no case to answer or where a case to answer is found but there is no current impairment. This supports the principle of promoting the early and safe resolution of concerns, empowering

	professionals to reflect and learn from the concerns raised about their practice.
Ability to agree undertakings	Where a case to answer decision was reached, this would allow the Regulator, in appropriate cases, to agree undertakings with the registrant. Undertakings are an agreement between the regulator and registrant about their future practice and might include, for example, restrictions on what they can and cannot do and commitments to practise under supervision or to carry out training. In cases where an undertaking is not appropriate, a referral would be made to the fitness to practise committee. In cases where an undertaking was breached, appropriate action could be taken including referral to the fitness to practise committee. The ability to agree undertakings would increase the consensual disposal options available in the fitness to practise process, potentially providing a more proportionate and timely means of disposing of appropriate cases without the need for a costly, contested hearing.
The power to set out in rules charges for services undertaken	This would enable regulators to charge a proportionate in connection with the approval and re-approval of education and training programmes fee has previously been raised in respect of education programme approval activity as well as annual monitoring where indefinite approval is given.

3.2   Advanced Practice

In July we appointed a team from the University of Bradford to undertake the extensive research and engagement for the project. The team are due to produce a final report on 27 October 2020, with an interim report to be provided on 22 September (with a verbal update at 24 September Council to be provided). The research includes both qualitative and quantitative methodologies. The survey of registrants is currently live until 25 September 2020 and will be followed by semi-structured interviews and a survey of educators/bodies with responsibility for AP education programmes.

3.3   Professionalism and prevention

Following the Council's discussion of the direction of this work in July 2020, drafting of the framework itself has commenced and an early draft is presented to the Council at this meeting. The framework will identify the developments we plan to achieve in the next two years. Clear objectives, deliverables and timeline will be provided in an action plan appended to the Framework. Council will be invited to approve a final version in December 2020.

3.4 Education quality assurance model implementation

We are now in the implementation phase of this work. 'Early adopter' education providers are currently being identified. Dedicated resource is allocated and we remain on track to implement the new model on a pilot basis in January 2021. Subject to further refinement through these pilots, and the approval of the Education and Training Committee (ETC), we expect to fully implement the new model by September 2021. More detail can be found in the September update to the ETC [here.](here)

3.5 Registrant wellbeing

The Registrant wellbeing project is underway. Representatives from Policy, Prevention, FTP and Registration will be meeting at regular intervals to discuss the research findings and agreed actions. Our first area of focus is the tone of voice review, with colleagues are collecting templates from across FTP and Registration for review. They will also support in the development of the Health and Wellbeing strategy and action plan, the final versions of which will be presented to Council at its meeting in December.

3.6 Insight and intelligence

We are currently recruiting for an Insight and Intelligence Manager. This role will develop and lead the insight and intelligence function, ensuring we continually improve our ability to identify, capture, analyse and share insight and intelligence.

They will work collaboratively with colleagues across the organisation, supporting them to identify and collect relevant information, and develop effective processes to extract and analyse that information. They will plan and undertake analysis and research that informs our regulatory approach and supports our stakeholders.

This will of course require high quality data to be available to the HCPC. While we hold a great amount of useful data the way it is structured requires improvement. We will engage a supplier to validate our data architectural approach and solution design. This supports the HCPC's to incremental development of an enterprise data solution

3.7 Professionalism research

Community Research continue to make progress on this work. In July we completed a 3 week online discussion forum with 40 HCPC and GCC registrants. This allowed registrants to share positive examples of professionalism and their views on what resources on professionalism the regulators should develop. The forum and work was positively received and we've had some very detailed engagement.

From the findings, we've selected 5 stories of professionalism to showcase in our professionalism hub. These focus on the themes of communication, competence, reflection, leadership and service user centered care. The research team are now working with Postcode Films to develop 5 case study films. We hope to share the final report and films with Council at its meeting in December.

3.8 Standards of Proficiency Consultation

The SOPS consultation is still live, closing on 30 October. We continue to receive responses, with good engagement from registrants across the professions. Responses are largely supportive of our proposals but we've received some detailed feedback on topics such as EDI, digital skills and leadership where we could further strengthen the standards on these topics. The Policy team will be analysing the responses over Autumn and share our final decisions and analysis to Council at its meeting in March.

3.9 Inquiries and external reports

The HCPC has responded to several external consultations in recent months. Firstly, we responded to the British Dietetic Association's consultation on their draft curriculum framework. In this we expressed our broad support but highlighted the need for a greater emphasis on EDI. More details about our response can be found in our recent blog.

We have also responded to the National Data Guardian's consultation about revising, expanding and upholding the Caldicott Principles and the Parliamentary and Health Service Ombudsman's consultation on their Complaints Standards Framework. In both responses, we expressed support for the proposals and made suggestions for how these could be implemented in practice.

We are preparing responses to the DHSC's Distributing vaccines and treatments for COVID-19 and flu consultation. This makes proposals for how current medicines legislation can be adapted to make way for the implementation of any COVID-19 vaccine, with potential implications for our registered professionals.

We are also preparing a response to BEIS' call to evidence on the Recognition of professional qualifications and regulation of professions. This will outline how we currently regulate with a particular focus on how we process applications from overseas and what we would want from any future model of recognition.

4. COVID-19 Response

4.1 Temporary register statistics

The tables below set out the number of temporary registrants on each of the registers as of 10 September 2020. In summary there are 24,559 temporary registrants across both registers.

	Former registrants			Students			
	Reg	Non-reg	Total	Reg	Non-reg	Temp >full	Total
AS	266	6	272	6	0	1	7
BS	3123	65	3188	305	3	97	405
CH	832	32	864	63	1	75	139
CS	576	14	590	248	0	10	258
DT	524	18	542	156	0	132	288
HAD	154	2	156	2	0	0	2
ODP	634	39	673	75	3	131	209

OR	165	6	171	37	0	25	62
OT	3625	122	3747	658	2	500	1160
PA	1784	58	1842	178	22	170	370
PH	3086	124	3210	730	8	822	1560
PO	107	1	108	16	0	9	25
PYL	1417	40	1457	150	0	27	177
RA	3347	108	3455	324	20	549	893
SL	1671	51	1722	300	8	113	421
Total	21311	686	21997	3248	67	2661	5976

Registered = added to the temporary register
Non-registered = added to the temporary register but subsequently removed
Temp > full = students have graduated and have joined the permanent register

4.2   Closure of the temporary register for students

As noted in my last report, following engagement with key stakeholders, we will close the temporary student register at the end of September 2020, preparations for this are underway.

Stakeholder feedback has recently indicated that there is an ongoing need for Biomedical Scientist and Clinical Scientist students to be temporarily registered, due to ongoing COVID to testing demands and the impact of this on the ability of students to complete their studies and enter the permanent register. We will continue the student register for these two groups only until the end of November 2020.

4.3   Remote FTP hearings

In July we commenced holding final substantive hearings remotely, and at time of writing we have concluded 22 final hearings in this way. Feedback on remote hearings held to date has been broadly positive. There does not appear to have been an increase in matters being adjourned or going part heard because of the remote nature of the hearing. We have held remote hearings where observers have been present, including one hearing where a member of the press was present, which went well. No concerns have been raised with us during or after a hearing about fairness, procedure or conduct of the remote event.

We continue to list all hearings activity as a remote event initially, in line with our Remote Hearings Protocol which was published at the end of July. The listing of hearings that were postponed during the lockdown, or which ready to schedule prior to the lockdown but could not be progressed, has been the Tribunal Services' priority over the summer. By the end of September, all such cases will have a confirmed hearing date.

As well as holding hearings remotely, the pandemic has also required us to adapt how we communicate with participants in the fitness to practice process. Primarily, this has meant serving notices and documents on registrants by email rather than by post, as required in our legislation. We have decided to apply to the Department of Health and Social Care for an emergency change to our Rules to formalise these two changes to the way we have been operating during the pandemic. The new Rules would give us the express provision to hold remote hearings during an emergency, and permanent powers to serve notices and documents electronically. We have consulted with stakeholders on the proposed changes and are currently analysing the comments we received. Once that consultation process has concluded, we will

come to Council formally to approve the proposed new Rules in line with our governance procedures.

4.4 Remote education approval and monitoring

Following engagement with stakeholders, approvals activity will remain virtual for the 2020-21 academic year. Our experience, and that of visitors and education providers is that the same quality of decision making and scrutiny is possible through virtual visits, and the organisational aspects run smoother. ETC approved this approach at its meeting in September.

4.5 Registration operations

Our registration KPIs for application processing times have returned to within target levels following an initial deterioration in productivity due to the change to remote working.

As of the end of August we have registration team on site presence, enabling phone lines to be reopened. The remote telephony solution, enabling registration call centre calls to be routed to employees working outside of the office will be in place by the end of September. This technology has already been deployed within FTP.

5. Organisational development

5.1 HCPC Reset and Renewal - Principles for establishing a new normal

The short life working group of employees across all levels I established to consider the principles that should underpin establishing a 'new normal' at HCPC informed by our experiences of working during Covid has now met twice. The group has provided valuable insights into employees' experiences of working during Covid and the opportunities for re-shaping HCPC's culture. There was great enthusiasm for establishing a new working culture and adopting the principles which have now been confirmed as:

1. Embed a renewed agile and flexible working culture
2. Establish new operating models that incorporate virtual delivery of key processes
3. Improve user experience for registrants and key stakeholders
4. Have technology solutions that support new ways of working
5. Adopt an agile approach to prioritising and managing projects
6. Collaborate to jointly solve problems
7. Ensure equality, diversity and inclusion underpins what we do
8. Support and develop our people with easy access to relevant learning and wellbeing support
9. Establish a learning culture – creating safe spaces to reflect, challenge and learn
10. Reduce our costs and environmental impacts through reducing the size of the estate and the amount of activity that requires travel

A more formal action plan to implement the principles will be developed. However, as a priority our HR policies on flexible and home working are being reviewed to support the embedding of a more flexible working culture. Progress has also been made with technology solutions to support new ways of working which include: remote telephony, electronic document transfer, virtual hearings, establishing a MS

Teams proof of concept meeting room in Park House and a new online performance management system 'Perform'.

5.2 Equality Diversity and Inclusion

In late August we appointed a research team from the Cardiff Met University to undertake the analyses of the Equality, Diversity and Inclusion (EDI) data we hold for registrants, staff and partners (the brief can be found here) and are looking forward to their final report on 06 October 2020.

We have also been carrying out the planned recruitment for the EDI Policy Manager and will hopefully have the successful candidate in post within the next three months. We are also hosting the first virtual EDI Forum for registrants and other key stakeholders on 14 September, where we will test some initial ideas for our first EDI Strategy. The key themes of those discussions will be presented during the EDI update item on the Council's agenda.

5.3 Regulatory IT systems

The major project to replace our legacy registration system is progressing well, final configuration of the production environment is in progress and the new system is expected to go live in October as planned.

The business case for the replacement of the FTP IT system is on the September council agenda. The approach for this project is to implement an off-the-shelf legal case management solution, with out of the box configuration only. This approach will enable time and cost to be predicted accurately. This will serve as a test case for the HCPC Digital Transformation Strategy principles.

5.4 Senior Management Team

I am pleased to report that, following a competitive campaign with many excellent candidates the recruitment of the Executive Director of Regulation was successful and the preferred candidate has confirmed their acceptance. I will provide more information as part of the private agenda item.

5.5 Finance

A full finance report is included on the Council's agenda. Our headline position is a year to date surplus of £325k, which is a favourable variance of £684k when compared to the budgeted deficit of £329k. The variance is due to the significant reduction in FTP hearing costs compared to forecast as a result of the pandemic restrictions.

5.6 Fee increase

Following constructive discussions with the Unions, the Executive has followed up with a briefing note. This outlines the changes we are proposing and restates our case. We have shared this with officials from Scottish Government and understand they will be briefing the Cabinet Secretary imminently both on these changes and the positive engagement with the Unions. We await the outcome of this briefing.

5.7   Risk management development

Following feedback from the Audit Committee, we are developing the way we manage and document risk. The strategic risk register has been developed (appendix D) to include risk appetite as a consideration, and to provide more clarity on the influencers of risk scoring.

As we develop our new Corporate Strategy it is important that we revisit our strategic risks and risk appetite to ensure cohesion and relevancy. A facilitated Council workshop will be held on risk appetite in October. New strategic risks aligned with the new Strategy will be presented to Council for adoption in early 2021.

Running alongside the strategic risk development, we will run a departmental project to review how we manage operational risk, with the aim of foregrounding risk considerations in decision making.

Appendix A

Chief Executive's Meetings

Meeting schedule period covering 28 July 2020 – 23 September 2020

Introduction meeting Kamini Gadhok, Chief Executive - The Royal College of Speech and Language Therapists (RCSLT)	29 July
Introduction meeting Karen Middleton, Chief Executive - The Chartered Society of Physiotherapy (CSP)	30 July
Interviews for Executive Director of Regulation	4 & 7 August
Discussion with Executive Director of Regulation final shortlisted candidates	25 August
Suzanne Rastrick, Chief Allied Health Professions Officer - NHS England	25 August
CEORB Meeting	26 August
AHP's Development of HCPC 5 Year Strategy	26 August
Development of HCPC Strategy, Jane Beach – Unite	27 August
Simon Whale - Luther Pendragon	27 August
Professional Bodies Corporate Strategy workshop	27 August
FTP CMS IT supplier demonstration	28 August
HENSE Q3 2020 – DHSC	2 September
Introduction meeting with Antony Claxton - BDB Pitmans	3 September
Monthly Meeting with Matthew Smith - BDB Pitmans	9 September
Mark Bennett – DHSC	10 September
Dr Philippa Whitford MP	11 September
GMB National Ambulance Committee	16 September
Unison – Celestine Laporte	16 September
People Plan - AHP Workforce & Education Strategic Oversight Forum	18 September
Simon Whale – Luther Pendragon	23 September

Appendix B

Key Performance Indicators dashboard

The KPI reporting for this period uses the new FTP KPI measures as agreed by the Council in July 2020. The current KPIs are included in this report, whilst the background data is provided to members separately for information in order to keep the report concise.

The HCPC's internal auditors BDO LLP are currently undertaking a review of the HCPC's performance reporting processes including a benchmark of KPIs. The recommendations and findings from this report will assist us in proposing a new suite of KPIs to the Council at a future meeting.

KPI performance results to highlight to Council:

- FTP

  - The impact of the COVID temporary pause of all hearings and invesitgations activity can been seen in the KPI results for this period. We have restarted some hearings and investigations, however progression continues to be challenging for some cases

- Registration

  - The dip in performance for application processing times noted in the July report has corrected as expected and processing times are within target.
  - In August we recommenced registration appeal hearings virtually.
  - A total of 18,376 UK emails were received which is 180% more than the same period in 2018 (2 year registration cycle comparator). All emails were answered within a median time of 2 working days. The closure of the office attributed to the increase in emails being received, we now have a team on site and phone lines have reopened.

Fitness to Practise

Measure	**Performance** - *Is the number of live FTP concerns decreasing?* **Monthly net movement in live FTP cases -** our target is that there are less live cases than the previous month	**Period**	September

Executive commentary	Since January 2020 there has been a slowly decreasing trend in the number of new concerns which has alleviated some of the case flow productivity issues that are a result of the COVID-19 response. Progressing some cases during this time has been challenging and as a result the number of active cases is increasing.

Year to date Caseload net movement	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	YTD total
	-2	+12	+13	+10	+27	+18							+80

Measure	**Risk** – *is the backlog of FTP concerns decreasing?* **Variation positive or negative from the trajectory that backlog will be eliminated by October 2021**	**Period**	September

Executive commentary	The issue with professing hearings virtually has resulted in an increased caseload post ICP. Triage and Threshold have productivity concerns which is limiting the flow of cases.

	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	
Backlog trajectory	401	379	357	335	313	291							
Backlog actual	401	374	367	378	367	390							
Difference	0	-5	+10	+43	+54	+99							

Measure	**Quality** – *Is the number of old cases decreasing?* **Variation positive or negative form the trajectory that cases older than the expected time* + 50% will be eliminated by April 2021**	**Period**	September

Executive commentary	The case-flow delays are being exacerbated in older cases which are more challenging to progress in the current circumstances.

	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	
Old cases trajectory	663	608	553	498	443	388							
Cases >1.5 target	663	665	467	545	614	620							
Difference	0	+57	-86	+47	+171	+232							

Measure	**Resource –** *what is the FTE rate?* **Measure is the FTE fill rate as a % of the budgeted FTE -** Our target is 100%											**Period**	September
Executive commentary	Strategies to improve recruitment and retention are being explored.												
	Mar-20	**Apr-20**	**May-20**	**Jun-20**	**Jul-20**	**Aug-20**	**Sep-20**	**Oct-20**	**Nov-20**	**Dec-20**	**Jan-21**	**Feb-21**	
Budgeted est.	129.0	101.2	101.2	101.2	108.0	108.0							
Perm staff	76.6	75.6	76.6	79.8	81.0	81.0							
Fixed term staff	4.0	7.0	5.0	6.0	7.0	5.0							
Agency staff	15.0	18.0	16.0	15.0	16.0	10.0							
Total staff	95.6	100.6	97.6	100.8	104.0	96.0							
FTE fill %	74.1%	99.4%	96.4%	99.6%	96.3%	88.9%							

Measure	**Staff wellbeing** – *what is the short-term sickness rate?* **Measure – short term sickness**											**Period**	September
Executive commentary	Other wellbeing indicators as well as talent management indicators such as training completion rates are part of the more detailed management indicators within FTP												
	Mar-20	**Apr-20**	**May-20**	**Jun-20**	**Jul-20**	**Aug-20**	**Sep-20**	**Oct-20**	**Nov-20**	**Dec-20**	**Jan-21**	**Feb-21**	
Short term	22	14.75	2.5	8.75	35.33	5.							
Long term	30	-	-	17	-	63							

*Each stage of the FTP progress has an expected timeframe, e.g. Triage - two weeks, Threshold - 10 weeks, Investigation – 12 weeks plus 10 weeks for the registrant to prepare for the ICP and Final Hearings – 39 weeks.

Education

Measure	**Median time to produce visitors reports following a visit: one calendar month**		**Period**		September									
Executive commentary	Performance remains within target.													
Year to date		**Sep-19**	**Oct-19**	**Nov-19**	**Dec-19**	**Jan-20**	**Feb-20**	**Mar-20**	**Apr-20**	**May-20**	**Jun-20**	**Jul-20**	**Aug-20**
	Days	27	27	25	26	27	26	28	28	27	28	29	29
Previous year		**Sep-18**	**Oct-18**	**Nov-18**	**Dec-18**	**Jan-19**	**Feb-19**	**Mar-19**	**Apr-19**	**May-19**	**Jun-19**	**Jul-19**	**Aug-19**
	Days	27	28	28	28	28	28	28	28	28	27	27	27

Registration

Measure	**Median processing time for UK graduates: 10 working days**								**Period**		September	
Executive commentary	This indicator is in line with the optimum figure.											
Year to date		Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
	Working days	12	12	9	10	2	3	3	5	1	2	4	2
Previous year		Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
	Working days	10	7	5	7	6	7	10	9	2	4	10	10

Measure	**Median processing time for International applications (European Mutual Recognition): 60 working days**								**Period**		September	
Executive commentary	This indicator is in line with the optimum figure.											
Year to date		Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
	Working days	53	58	50	47	48	46	49	38	53	62	53	57
Previous year		Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
	Working days	42	49	46	54	52	55	55	38	39	41	42	45

Measure	**Median processing time for International applications (Non-European Mutual Recognition): 60 working days**								**Period**		September	
Executive commentary	This indicator is in line with the optimum figure.											
Year to date		Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
	Working days	53	56	48	49	44	47	52	46	58	76	48	36
Previous year		Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
	Working days	35	49	46	54	51	57	51	39	40	46	42	44

Registration

Measure	Number of upheld appeals against registration decisions								Period		September	
Executive commentary	Registration appeals hearings have recommenced on a virtual basis in August.											
Year to date		Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
	Concluded	4	3	5	5	4	4	3	0	0	0	0	4
	Upheld	2	1	5	1	2	2	3	0	0	0	0	2
Previous year		Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
	Concluded	7	4	6	4	6	5	5	7	6	5	4	4
	Upheld	4	2	4	1	3	4	2	4	5	4	1	2

Finance

Measure	Performance against budgeted operating expenditure in range of 97.5% to 102.5%								Period		September	
Executive commentary	Performance against forecasted operating expenditure is not within the optimum range. This is mainly due to the un-certainties around predicting the impact of COVID-19 on future costs and timing differences of some costs. Full financial information including the variance commentary, income and expenditure figures and the statement of financial position can be found in the finance update paper.											
Year to date	(,000)	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
	YTD Actual	17,973	21,149	23,942	26,456	28,001	30,393	32,745	2,353	4,251	6,199	8,177	10,215
	YTD Budget	19,191	22,221						3,204	5,642	8,155		
	YTD Forecast			24,027	26,919	28,164	30,720	33,422				8,598	11,277
	YTD Variance	1,218	1,488	85	463	164	327	677	851	1,391	1,956	421	1,062
	Actual as % of budget	94%	95%	100%	98%	99%	99%	98%	73%	75%	76%	95%	91%
Previous year	(,000)	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19
	YTD Actual	17,436	20,377	23,398	26,083	28,879	31,522	34,957	3,606	6,466	9,356	12,306	15,025
	YTD Budget	18,079							4,016	7,069	10,076	13,129	16,111
	YTD Forecast		20,564	23,671	26,727	29,047	32,151	35,472					
	YTD Variance	642	187	273	644	168	628	516	410	603	720	822	1,087
	Actual as % of budget	96%	99%	99%	98%	99%	98%	98%	90%	94%	93%	94%	93%

Human Resources

Measure	Employee voluntary turnover: 22% (21.8% London average, Xpert HR labour turnover rates, published 5 May 2018)							**Period**		September		
Executive commentary	There has been a decrease in employee turnover in this quarter although year to date figures are still high in comparison to the London average. With the introduction of the apprenticeship scheme along with further training, it is hoped that turnover figures become more stable.											
Year to date		**Sep-19**	**Oct-19**	**Nov-19**	**Dec-19**	**Jan-20**	**Feb-20**	**Mar-20**	**Apr-20**	**May-20**	**Jun-20**	**Jul-20**	**Aug-20**
	Turnover	23%	25%	31%	32%	35%	37%	23%	41%	41%	41%	41%	40%
Previous year		**Sep-18**	**Oct-18**	**Nov-18**	**Dec-18**	**Jan-19**	**Feb-19**	**Mar-19**	**Apr-19**	**May-19**	**Jun-19**	**Jul-19**	**Aug-19**
	Turnover	23%	22%	22%	23%	22%	21%	19%	19%	21%	21%	21%	22%

Measure	Employee sickness absence							**Period**		September		
Executive commentary	The last quarter has seen a slight decrease in employee sickness absence. However, short term absences in June increased in comparison to May.											
Year to date		**Sep-19**	**Oct-19**	**Nov-19**	**Dec-19**	**Jan-20**	**Feb-20**	**Mar-20**	**Apr-20**	**May-20**	**Jun-20**	**Jul-20**	**Aug-20**
	Sick days	228	231	293	245	277	277	143	78	33	79	71	75
Previous year		**Sep-18**	**Oct-18**	**Nov-18**	**Dec-18**	**Jan-19**	**Feb-19**	**Mar-19**	**Apr-19**	**May-19**	**Jun-19**	**Jul-19**	**Aug-19**
	Sick days	110	106	163	108	154	169	207	154	161	206	194	148

Information technology

Measure	Availability of HCPC websites (including Register and online portal): 99.5%							**Period**		September		
Executive commentary	The availability of the core production systems remains stable and above the targeted KPI.											
Year to date		**Sep-19**	**Oct-19**	**Nov-19**	**Dec-19**	**Jan-20**	**Feb-20**	**Mar-20**	**Apr-20**	**May-20**	**Jun-20**	**Jul-20**	**Aug-20**
	Availability	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100%	100%	99.7%	100%	100%
Previous year		**Sep-18**	**Oct-18**	**Nov-18**	**Dec-18**	**Jan-19**	**Feb-19**	**Mar-19**	**Apr-19**	**May-19**	**Jun-19**	**Jul-19**	**Aug-19**
	Availability	100.0%	100.0%	95.6%	99.9 %	100.0%	100.0%	100.0%	99.52%	99.4%	98.9%	99.9%	99.6%

FTP performance dashboard September 2020

1. Demand - what is the trend of new FTP concerns?

	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
High	2	3	1	4	6	3	5	3	4	2	-	5	5	4	5	4	2	4	3	2	1	2	2	3
Medium	14	22	9	19	22	26	16	23	24	11	34	16	29	31	31	25	28	24	32	25	28	19	32	24
Low	62	51	61	74	91	67	64	53	71	73	71	71	72	64	96	67	96	94	77	89	70	89	73	68
3 mo rolling average	81	74	75	81	95	103	99	86	88	88	97	94	101	99	112	109	118	115	120	117	109	108	105	104
6 mo rolling average	75	76	78	81	85	89	90	91	96	94	92	91	95	98	103	105	109	114	115	117	112	114	111	107

graph - new concerns – risk and month

> Since January 20 there has been a slowly decreasing trend in the number of new concerns which has alleviated some of the case flow productivity issues that are a result of the Covid-19 response. Progressing cases during this time has been challenging. As a result the number of active cases is increasing as seen below.

2. Performance - is the number of live FTP concerns decreasing?

2020	Mar	Apr	May	Jul	Jul	Aug	YTD
Caseload net movement	-2	+12	+13	+10	+27	+18	+80

in the current recovery circumstances, it is probably the single most important KPI. The essential target is that each month there be less live cases that the previous month.

Case-flow excluding Rule 12	In month	Avg 3 months	Avg 6 months	Avg 12 months
PRE-ICP CASES				
Open cases at START of period	1,016			
Add: New concerns received	95	104.0	107.5	111.3
Less: Closed at Triage	(8)	(5.0)	(3.0)	(2.3)
Less: Closed at Threshold	(38)	(43.3)	(47.8)	(45.4)
Less: Closed at ICP (NCA)	(25)	(27.3)	(34.2)	(30.6)
Less: Moved to Post-ICP (Hearings) (a)	(26)	(24.0)	(28.5)	(30.4)
Add/Less: Other case movement	(4)	-	-	-
Net cases added/(closed) in period	**(6)**	**4**	**(6)**	**3**
Open cases at END of period	1,010			
POST-ICP CASES (HEARINGS)				
Open cases at START of period	407			
Add: Cases moved from Pre-ICP (a)	26	24.0	28.5	30.4
Less: Closed concluded at FH	(11)	(8.7)	(8.8)	(14.0)
Add/Less: Other case movement	(2)	-	-	-
Net cases added/(closed) in period	**13**	**15**	**20**	**16**
Open cases at END of period	420			
HCPC HIGH-LEVEL CASE FLOW SUMMARY				
Open cases at START of period	1,423			
Add: New concerns received by HCPC	95	104.0	107.5	111.3
Less: Closed	(82)	(84.3)	(93.8)	(92.3)
Net cases added/(closed) in period	**13**	**19.7**	**13.7**	**19.1**
Open cases at END of period (b)	1,436			
Rule 12 cases excluded from above (c)	59			
Add/Less: Other case movement	(6)			
Total HCPC cases at end of period	**1,489**			

(a) Internal movement only - not a physical (loss) / receipt of cases

    Some cases are closed at a point Pre/Post-ICP but may become live at a later stage

    HCPC have minimal control over progress of these cases and are excluded from case flow performance
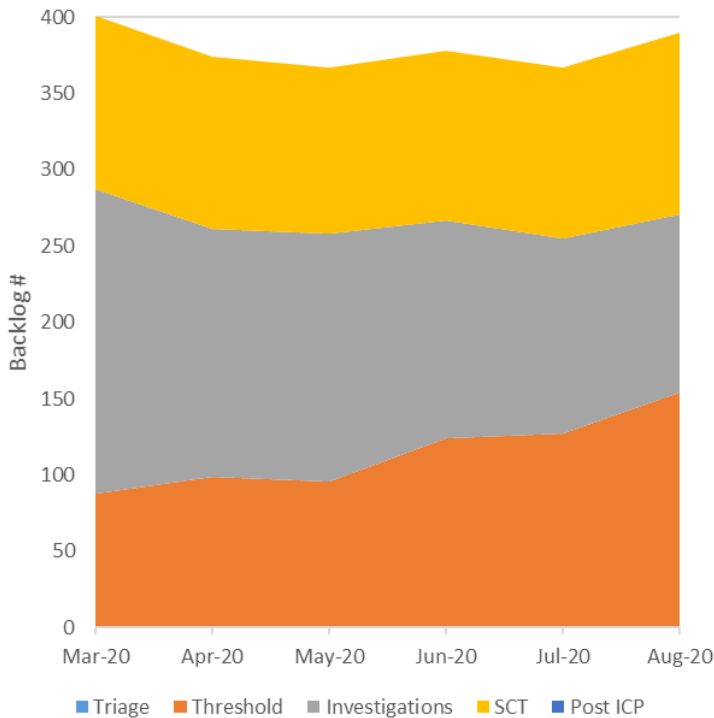
    All R12 cases are pre-ICP

3. Risk - is the backlog of FTP concerns decreasing?

	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
Backlog Trajectory	401	379	357	335	313	291
Backlog Actual	401	374	367	378	367	390
Difference	0	-5	10	43	54	99

Case Load By Function
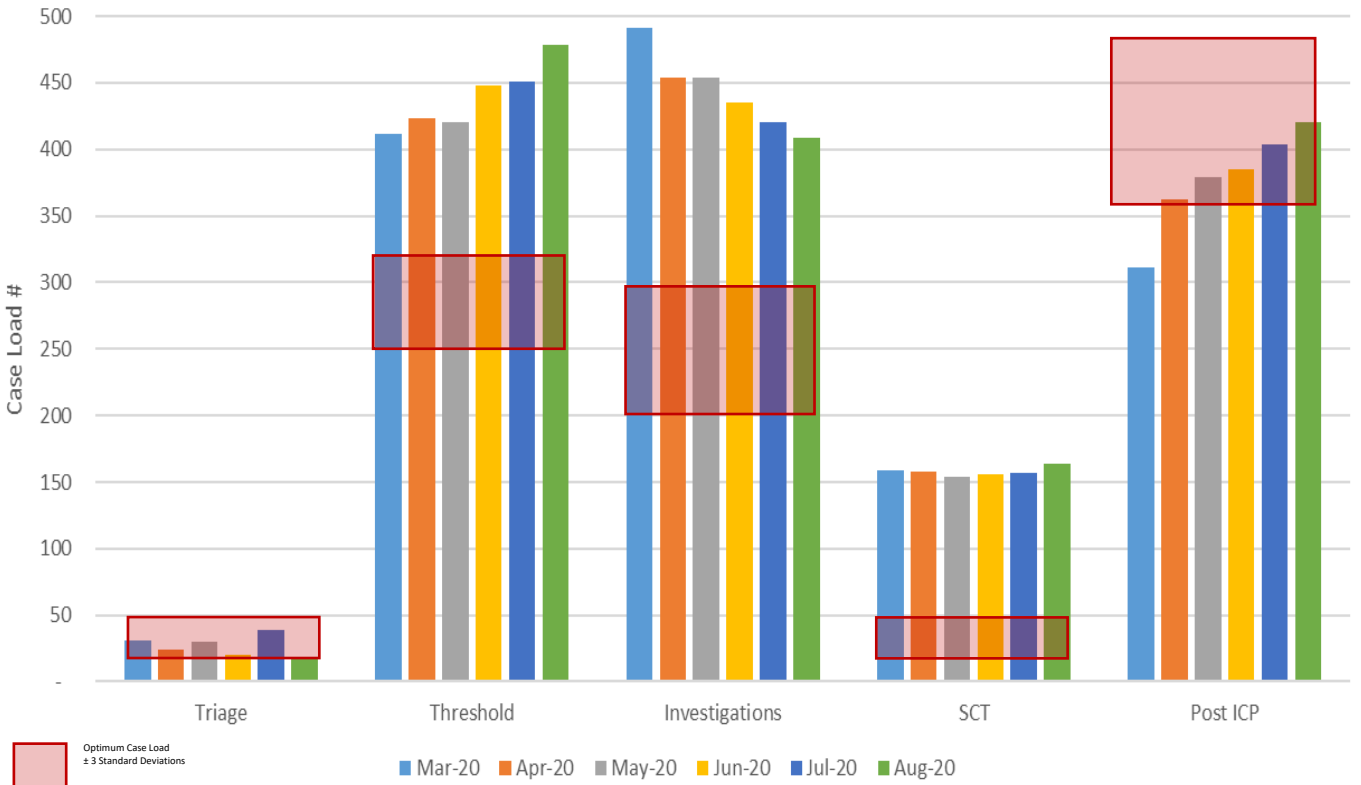
Backlog by Function

Moving from physical Hearings to virtual Hearings has caused a delay in Hearings which has resulted in a increasing caseload Post-ICP. Triage and Threshold has increasing caseloads which is an indicator that productivity is decreasing.

The FTP budgets have been prepared on the assumption that the backlog will be eliminated over an 18-month period - by 30th September 2021.

4. Quality - is the number of old cases decreasing?

	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
Old Cases Trajectory	663	608	553	498	443	388
Cases >1.5 Target Actual	663	665	467	545	614	620
Difference	0	57	-86	47	171	232

Ageing Profile

TEAM WIP SUMMARY AT 31-AUG-20

	Total cases	SLA Target	Cases < Tgt	Cases > Tgt		Cases > Tgt		Concerned cases at 150% of Tgt		Issue cases > 150% of Tgt	
Triage	18	2 wks	6 (33%)	12 (67%)				3 wks	–	>3 wks	12
Threshold	478	10 wks	158 (33%)	320 (67%)				15 wks	111	>15 wks	209
Investigations	409	22 wks	150 (37%)	259 (63%)				33 wks	72	>33 wks	187
SCT	164	12 wks	28 (17%)	136 (83%)				18 wks	13	>18 wks	123
Total Post-ICP	1,069		342	727					196		531
Post-ICP	420	39 wks	242 (58%)	178 (42%)				59 wks	89	>58.5 wks	89
Total HCPC	**1,489**		**584** (of Total HCPC 39%)	**905** (61%)					**285** (19%)	+	**620** (42%)

There is an increasing number of older cases indicating that the case-flow is focused on the more recent newer cases. The initial delays caused by Covid-19 need to be reversed and there is now a focus on clearing the older cases.

What are we doing to reduce the backlog?

Triage - During August there was a focus on the reducing the number of cases at Triage. The number of cases has been reduced and the September focus is for the older cases to be reduced.

Threshold - During August, case reviews have been undertaken of the older cases in Threshold and targeted action plans have been created. Many of these cases have been reallocated to Case Team Managers or Case Progression Specialists. It is anticipated that the majority of the older Threshold cases will have been either concluded at Threshold or transferred to Investigations. The target is to reduce the Threshold case-load to close to the business-as-usual operating range by the end of October.

Investigations - The progression of Triage and Threshold cases will create a wave of new cases in Investigations that are already aged. Case Team 6, which was closed down after the transfer of Social Workers, has been reactivated, with a dedicated team to manage these cases during the Investigation stage. By separating these cases we can manage their KPIs without skewing the KPIs of Case Team 4 and Case Team 5.

Hearings - All outstanding postponed hearings and pre-lockdown Ready to Fix (RTF) cases are in the process of being scheduled. We expect that, with the exception of five cases, which require a preliminary hearing or further investigation due to another linked FTP case, all these outstanding hearings will have a confirmed future hearing date by the end of September. They are projected to have concluded by March 2021.

Below are the age profiles of each process stage. They show that there are more older cases in all FTP teams, even in the teams that are managing to progress cases.

Triage
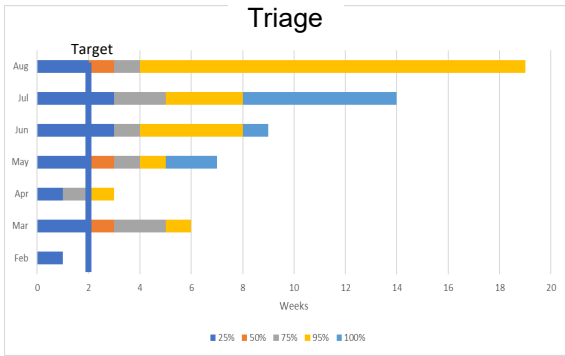
	< 2 Wks	3-4 Wks	5-6 Wks	7-8 Wks	9-10 Wks	11-15 Wks	16-20 Wks	Total
Feb	7							7
Mar	4	5	1					10
Apr	4	1						5
May	9	16	3	1				29
Jun	3	11	2	3	1			20
Jul	7	16	6	4	3	3		39
Aug	6	8	1		1		2	18

Threshold
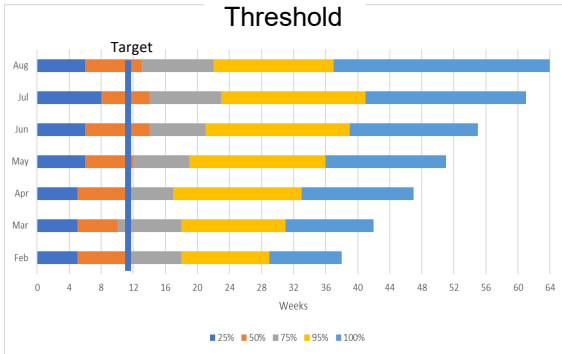
	< 5 Wks	6-10 Wks	11-15 Wks	16-20 Wks	21-25 Wks	26-30 Wks	>30 Wks	Total
Feb	129	90	97	54	42	21	20	453
Mar	109	116	61	59	34	32	22	433
Apr	115	97	96	39	35	27	31	440
May	89	85	86	71	26	22	41	420
Jun	104	83	63	82	52	17	47	448
Jul	76	96	83	54	66	32	44	451
Aug	119	63	96	71	41	48	40	478

SCT
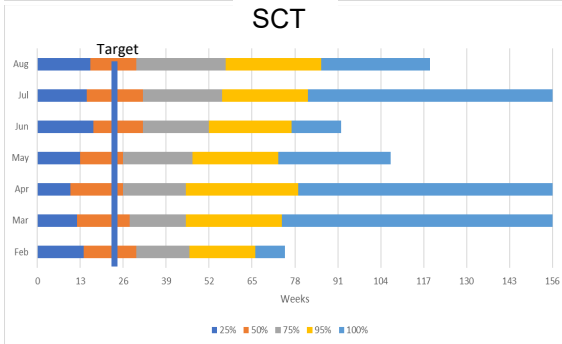
	< 13 Wks	14-26 Wks	27-39 Wks	40-52 Wks	53-65 Wks	66-78 Wks	>79 Wks	Total
Feb	39	35	33	21	21	11		160
Mar	42	32	34	19	21	6	5	159
Apr	60	24	24	27	15	10	4	164
May	41	36	26	20	12	13	3	151
Jun	28	38	28	23	18	18	3	156
Jul	32	40	22	19	19	12	13	157
Aug	37	29	30	20	18	12	18	164

Investigations
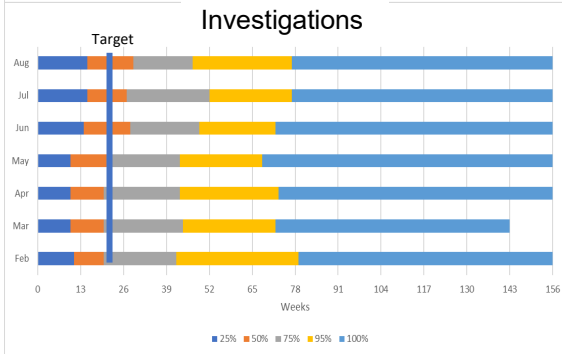
	< 13 Wks	14-26 Wks	27-39 Wks	40-52 Wks	53-65 Wks	66-78 Wks	>79 Wks	Total
Feb	186	79	75	90	13	15	25	483
Mar	151	136	69	90	8	16	21	491
Apr	159	117	32	71	43	13	15	450
May	163	135	40	47	49	9	15	458
Jun	102	110	92	48	58	5	20	435
Jul	89	115	91	22	46	37	20	420
Aug	92	96	96	29	38	39	19	409

Post ICP
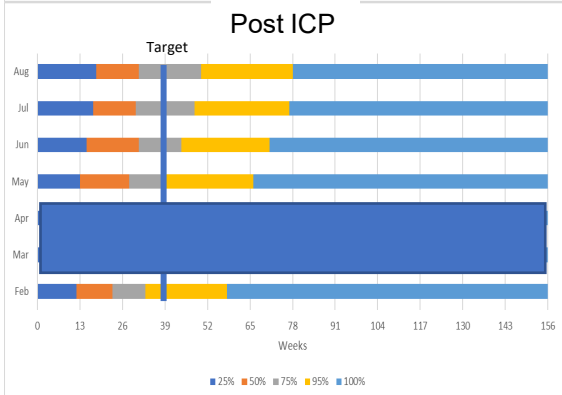
	< 13 Wks	14-26 Wks	27-39 Wks	40-52 Wks	53-65 Wks	66-78 Wks	>79 Wks	Total
Feb	83	107	67	28	15	3	5	308
Mar								311
Apr								362
May	100	85	100	51	22	15	6	379
Jun	84	92	76	74	33	18	8	385
Jul	58	110	69	98	36	13	20	404
Aug	73	96	78	84	50	19	20	420

5. FTP people

FTE at Month End	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
Budgeted Establishment	129.0	101.2	101.2	101.2	108.0	108.0
Permanent Staff	76.6	75.6	76.6	79.8	81.0	81.0
Fixed Term Staff	4.0	7.0	5.0	6.0	7.0	5.0
Agency Staff	15.0	18.0	16.0	15.0	16.0	10.0
Total Staff	95.6	100.6	97.6	100.8	104.0	96.0
FTE Fill Rate	74.1%	99.4%	96.4%	99.6%	96.3%	88.9%

Sickness - Days	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20
Short-term	22.00	14.75	2.50	8.75	35.33	5.00
Long-term	30.00	-	-	17.00	-	63.00

Strategies to improve recruitment and retention are being explored. The main strategy being explored to recruit to a pool of potential employees so that staff can be appointed and trained in advance of staff leaving. This is aimed at preventing short term agency requirements to fill recruitment timing gaps. Our target is to have 100% FTE fill rate

Experience Profile of FTP Staff
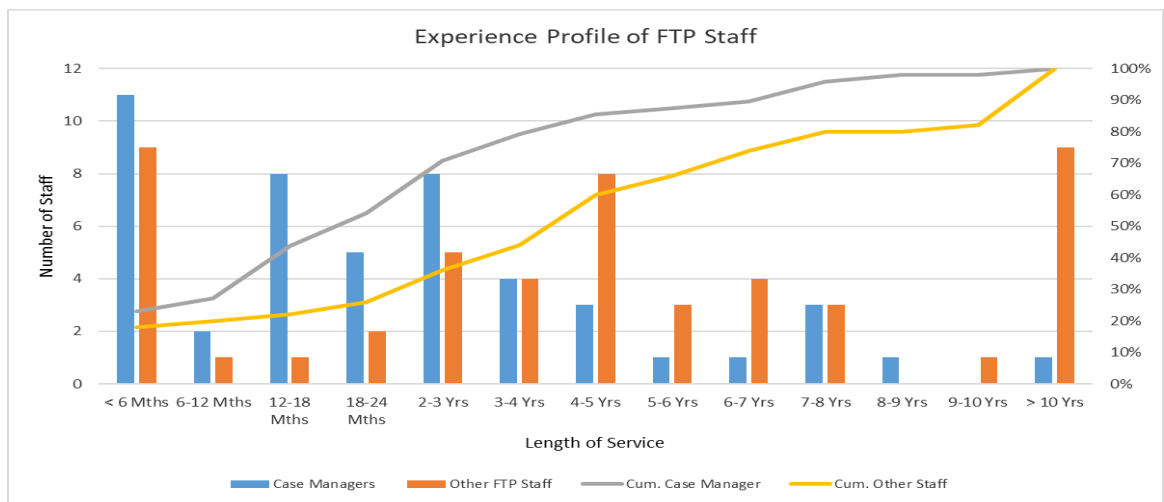
6. FTP finance

		Aug-20					Year To Date		
		Actual	+3 Forecast	Var	Var%		Actual	+3 Forecast	Var	Var%
		£k	£k	£k			£k	£k	£k	
Pay Costs		402.97	431.26	28.29	7%		1,853.96	1,893.51	39.54	2%
Office Services Costs		4.13	39.68	35.55	90%		21.26	66.56	45.30	68%
Small Projects Costs		-	-	-	0%		0.65	0.65	-	0%
Travel & Subsistence Costs		-	4.21	4.21	100%		0.09	4.30	4.21	98%
Property Overhead Costs		0.16	-	- 0.16	-100%		0.16	-	- 0.16	0%
Partner Costs		92.19	313.37	221.18	71%		507.26	830.51	323.26	39%
Professional Fees & Costs		358.16	470.46	112.30	24%		1,666.46	1,926.28	259.81	13%
Total		859.61	1,260.98	403.37	32%		4,051.84	4,723.80	673.96	14%

August 20 Costs + Forecast
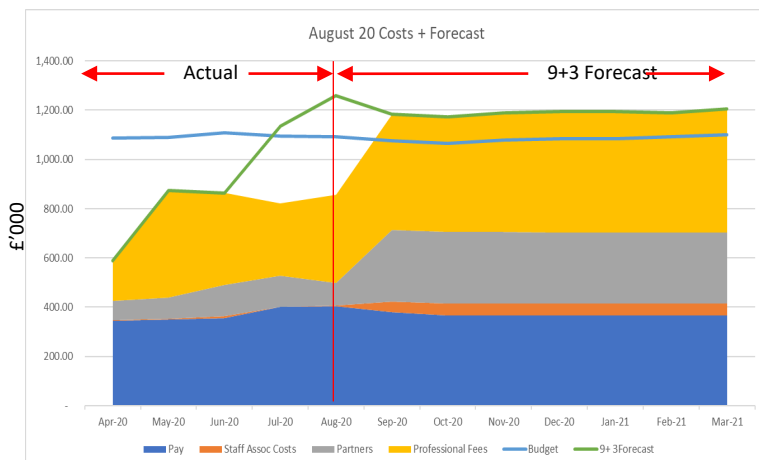
FTP actuals costs continue to be below the Budget and 9+3 Forecasts. This variances are timing differences driven by delayed Hearings.

While FTE is lower than the establishment, pay costs are close to budget because of the increased agency premium associated with the use of temporary staff.

While there is a £112k underspend in Professional Fees, included in this is a £76k overspend in Public Law fees due to the increase in IO extensions and advice regarding virtual ways of working.

Fitness to Practice (FtP) Recruitment Plan

Executive Summary

HCPC is undergoing the most significant period of change that has been seen. Recruitment and retention of good staff remains a challenge ensuring the organisation meets key targets and professional standards.

The paper articulates how we will develop the recruitment of quality staff who exhibit the key skills, experience, values and beliefs to undertake their job roles effectively.

The Fitness to Practice department has experienced difficulties with recruitment and retention of staff. Therefore, there is a need to increase substantive staff numbers in this department in order to ensure establishments meet safer staffing standards to eliminate reliance on agency staff and improve the overall quality and effective turnover of fitness to practices cases which are being received by the HCPC.

As such it is suggested that at present we cannot rely on traditional models as it's a time to be bold and innovative with a mandate that supports new ways of working.

Key objectives of FtP recruitment activity

• Reduce the FtP departments' dependency on agency workers, reducing overall workforce costs as well as ensure the provision of consistent high-quality work.
• Continue to raise the profile of the HCPC as the place to work (through LinkedIn and Glassdoor)
• Ensure a regular and consistent flow of employees to meet vacancy needs as a result of on-going recruitment based on turnover and service demand.
• Maximise cost effectiveness of Recruitment Advertising and use of multimedia platforms.
• Establish the HCPC Brand amongst key audiences.
• Develop the e-recruitment capacity and capability.
• Improve the efficiency of the recruitment process.
• Reduce the time taken to recruit and fill a vacancy but increase the quality of applicants.

Enhancing recruitment processes

Enhancing recruitment processes within the FtP department will deliver robust values based recruitment that ensures the right skill mix is secured and maintained.

There are a number of actions that will be undertaken to enhance the current recruitment process;

- Review processes and develop performance indicators to ensure time-scales are minimised.
- Recruitment will be managed as a streamlined process to minimise the possibility of loss of good candidates to other organisations and to optimise the future relationship between the successful candidate and HCPC.
- Time to recruit and quality of hire will be key performance indicators.
- Ensure full and effective utilisation of e-recruitment systems to streamline the recruitment processes wherever possible and ensure consistency in approach.
- The use of values-based assessments through the recruitment process.
- Continue to provide recruitment and selection training for managers and all staff involved in the recruitment process.
- Establish a system to utilise good candidates who have been interviewed but not appointed in the first instance. When similar jobs become vacant this database of staff can be managed via a waiting list system- used before going out to advert.
- Engage with passive candidates- turn incomplete applications to complete and submitted.
- A timeline of workforce flow and demand will be agreed and monitored to establish targeted recruitment based on flow.

Recruitment Challenges

HCPC currently faces challenges recruiting the following staff groups within the FtP department:
- Case Managers (across all functions)
- Triage Officers
- Presenting Officers
- Hearings Officers
- Scheduling Officers

Due to the importance of these roles and the essential need to fill vacancies within this department these 'hard to recruit' areas have been given priority when running recruitment campaigns.

Recruitment Strategies - Improving the way we advertise and attract

There is a need to raise the HCPC profile and develop greater branding of HCPC, where more sophisticated advertising through a multimedia approach would take the brand to more potential applicants, however the brand needs to ensure the unique

selling points are conveyed together with establishing HCPC as the employer of choice not just in London but more broadly.

Detailed below are strategies the HCPC will employ to get better value for money, improve the effectiveness of advertising and connect with possible applicants using the following means:

> LinkedIn - a cost-effective approach to recruitment advertising. HCPC will advertise all posts on LinkedIn. However, this alone will not attract the significant calibre of applicants we aspire to therefore the following media will also be considered:
> - HCPC website
> - Social Media ♣ Face Book ♣ Twitter
> - Text alerts (will develop this through our e-recruitment system)
> - Job boards (Reed, Guardian online, jobs.ac.uk, indeed, totaljobs)
> - Create a new jobcentre plus account
> - Vercida

Engaging with Academic Institutions

Birkbeck University of London, will also advertise all HCPC roles. In particular they will be commissioned to advertise and run recruitment campaigns for FtP roles and target their law schools in order to attract their recent law graduates. This partnership will further enhance the presence of HCPC in the labour market, promoting careers within the HCPC and inspiring university leavers to consider regulation as a serious career choice thus engaging with the potential younger workforce and ensuring a future workforce pipeline.

Establishing links with Jobcentre Plus

HCPC have the option to work with Job Centre Plus to utilise employment schemes to recruit the long term unemployed to suitable positions and/or target job seekers who may wish to work for HCPC. It is essential for HCPC to maintain good relationships with local Jobcentre Plus and other specific agencies whose aims are to support recruitment into regulation, and in particular get people back into work.

Introduction of Apprenticeships

BPP will also play a key role in supporting HCPC in recruiting Paralegal Apprentices into the FtP department. Recruitment for 4 Paralegal Apprentices are currently underway with the first cohort due to commence their placements in January 2021. The Apprentices will undergo training for 2 years and will become permanent Case Managers following successful completion of their Paralegal training. There will be a new cohort of 4 new apprentices every September.

Proactive Recruitment

HCPC will run recruitment campaigns at regular intervals throughout the year to ensure a regular supply of potential candidates to fill on-going/anticipated vacancies and establish an on-going presence in the job market place.

We will revisit the profile to make sure we are attracting the right calibre of candidate and to widen the pool of potential applicants

This may result in over recruitment - or at the very least, we should have a pool of candidates who are fully trained and ready to fill vacancies as they become available.

Summary

In summary this paper covers what recruitment methods are required in the short and medium term for the Fitness to Practice department in order to attract and recruit talent with the requisite skills.

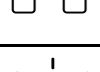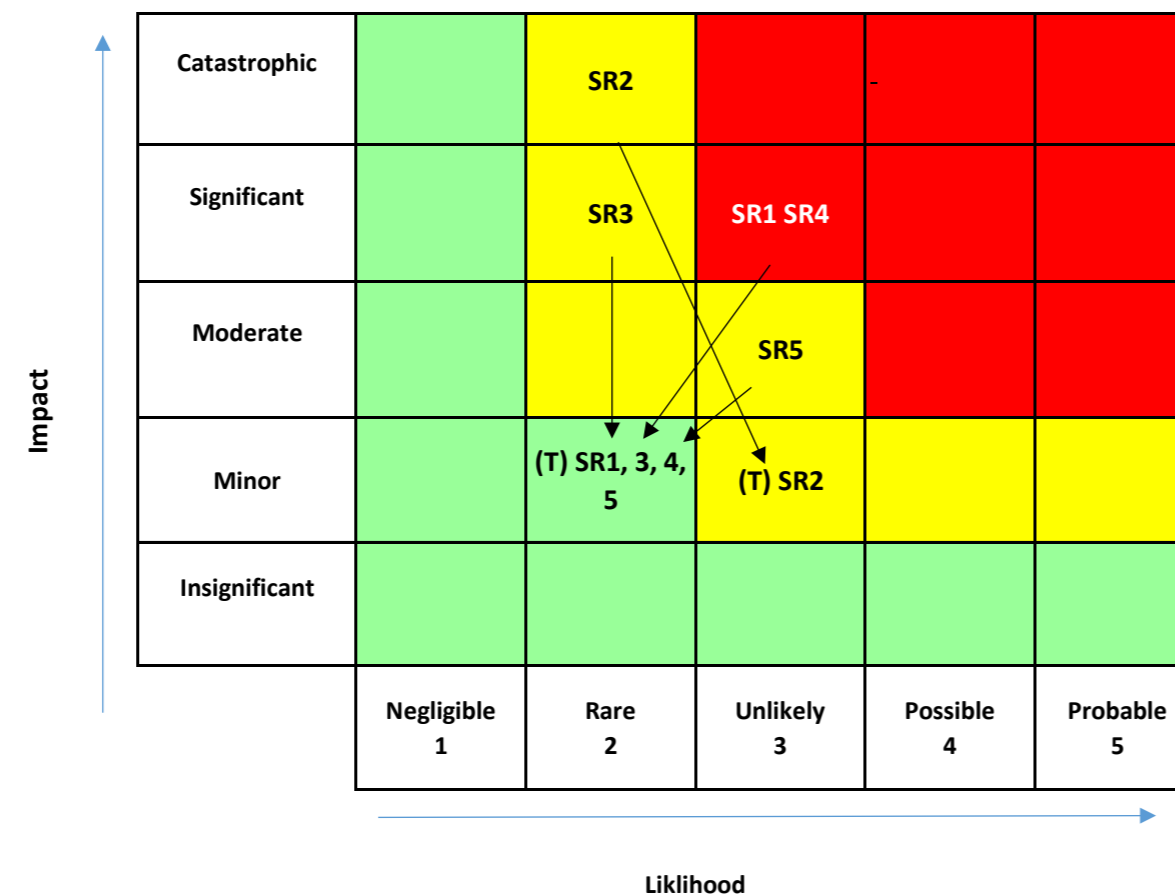|	
Decision	The Council is asked to note the report.
Next steps	HR and FtP will continue implementing the action plan and will be reviewed in Q4 by SMT.
Financial and resource implications	Social media – no cost implications LinkedIn – £11,934 for annual subscription Birkbeck Talent – £1500 per annum Reed online – £80 per credit Indeed online – £80 per credit Jobs.ac.uk – £294 per advert Job centre plus – free Vercida – £450 per advert BPP – free
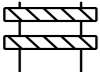
HCPC Strategic Risks

Summary of strategic risks

Strategic Risks - High Level	Risk Description	Residual Risk				Target Risk*
		Nov-19	Mar-20	Jun-20	Sep-20	
1. Failure to deliver effective regulatory functions	This includes the inability to fulfill our statutory obligations set out in the Health and Social Work Professions Order and the failure to meet the PSA's Good Standards of Regulation.	16	12	16	12	4
2. Failure to anticipate and respond to changes in the external environment	This includes the ability to respond and influence external drivers for change, like the impact of Brexit, devolution or a change in government as well as issues like workforce development, new and emerging professions or government policies affecting professional regulation. It also includes awareness and responsiveness to advances in technology and systems.	10	10	10	10	6
3. Failure to be a trusted regulator and meet stakeholder expectations	This risk includes the management of stakeholder engagement and key relationships as well as reputation management.	8	8	8	8	4
4. Failure to be an efficient regulator	This risk includes the operational failure of processes, or the inability to manage data efficiently as well the vulnerability of IT security. It also includes financial security, timely and accurate reporting and the recruitment, retention and training of Partners, Council and employees.	16	12	16	12	4
5. Failure of leadership, governance or culture	This risk includes the effectiveness of Council, strategy setting and oversight, risk management and business planning. It also covers organsitional culture including the existence of relevant policies for whistleblowing or anti-bribery for example and processes for performance development.	10	10	10	9	4

* Expected risk score post planned actions

Mitigation key

	Preventative
	Monitoring
	Detective
	Remedial
	Horizon scanning
	Best practice development
	Communication

Heat map of strategic risks - residual to target (T)

Impact

	Negligible 1	Rare 2	Unlikely 3	Possible 4	Probable 5
Catastrophic		SR2			
Significant		SR3	SR1 SR4		
Moderate			SR5		
Minor		(T) SR1, 3, 4, 5	(T) SR2		
Insignificant					

Liklihood

Strategic risk 1 - Failure to deliver effective regulatory functions

	Review date		Risk owner
	Sep-20		SMT lead - Executive Director of Regulation

Risk summary

This includes the inability to fulfil our statutory obligations set out in the Health and Social Work Professions Order and the failure to meet the PSA's Good Standards of Regulation.

	Impact		Liklihood	Risk Score
Inherent risk	5	x	4	20
Current risk	4	x	3	12
Target risk (planned mitigations in place)	2	x	2	4

reduction from June 2020

Current risk influencers

- ➕ HCPC not meeting a number of PSA standards
- ➖ Clear PSA improvement action plans in place monitored by internal working group
- ➖ Business improvement team working with FTP and registration. FTP improvement programme underway
- ➕ COVID temporary registers still in place, student register will close in Sep 20
- ➕ Hearings unable to run at full capacity due to remote working
- ➕ Productivity impacted by full home working, plan for phased return to office underway
- ➕ Pandemic impact progression of cases due to pressures on health sector
- ➖ Regulatory development in planning (AP, prevention, registrant wellbeing, new education QA model)
- ➕ Potential delay to regulatory reform due to change in government approach (ability to introduce more efficient processes and manage own fee levels)
- ➖ Quality assurance plan for 2020-21 underway following initial delay due to pandemic redeployment

Risk Appetite

The most appropriate risk appetite statement is for public protection. The Council takes a minimal approach to public protection risks. Public protection is our aim and our strategy and processes are intended to provide this.

The residual risk score is higher than a minimal appetite would tolerate. This risk will remain high while PSA standards are not met.

Current risk level is outside of risk appetite

Mitigations in place

1) Adherence to operational processes and legal powers set out in statutory legislation

2) Regular review of resourcing requirements to ensure they are adequate

3) Regular training for Partners and employees

4) Scheduled quality assurance and auditing processes

5) Delivery of workplans and monitoring through reporting /metrics

6) Information sharing through Memoranda of understanding

7) Learning through review of PSA performance reviews of other regulators and commissioned reviews within the sector

8) Regulatory functions refined to allow remote operation (COVID-19)

9) Proportionate Temporary registers removal process without full FTP process

Planned mitigations 2020-21 | progress

1) PSA standard improvement action plan (PSA Action Plan Working Group) (Q1-4) — Group meeting to review progress, impact of pandemic on initial action timelines

2) FtP Stabilisation and Sustainability project (FtP Q1-4) — Improvement programme presented to Council Jul 20

3) Education risk based QA model development (Education Q1-4) — ETC approved pilot Jul 20 will commence in Q4

4) Registration transformation and Improvement project delivery (projects, registration Q3) — Project on track to deliver in Oct 20

5) Monitoring regulatory performance through performance report and KPIs (All, ongoing) — KPIs reported to each Council meeting, new FTP KPIs agreed July 2020

6) Execution of the budget & agreed investment in regulatory performance (Finance, ongoing to Q4) — Q1 budget review complete

Reporting period commentary

o As the new format for the register has been applied the content has been updated, in particular planned mitigations for 2020-21 and the elements of risk section.
o Residual risk has reduced as the temporary measures put in place as a result of the pandemic are now tested and have not resulted in crystallisation of risk. Plans in place to wind down the temporary register for students.
o Regulatory development work for example AP, prevention, new education model, are all in planning stage and not reducing risk score yet.
o ED of Regulation designated SMT Lead for this risl. Post currently vacant and covered by CEO. Appointment has been made anticipate post holder in place before end of 2020.

Strategic risk 2 - Failure to anticipate and respond to changes in the external environment

Review date	Risk owner
Sep-20	SMT lead - Executive Director of Policy and External Relations

Risk summary

This includes the ability to respond and influence external drivers for change, like the impact of Brexit, devolution or a change in government as well as issues like workforce development, new and emerging professions or government policies affecting professional regulation. It also includes awareness and responsiveness to advances in technology and systems.

	Impact		Likelihood	Risk Score
Inherent risk	5	x	3	15
Current risk	5	x	2	10
Target risk (planned mitigations in place)	2	x	3	6

no change from June 2020

Current risk influencers

- Corporate Strategy Engagement underway with key stakeholders
- Positive feedback on HCPC responsiveness during pandemic
- Prevention agenda framework in development, to be approved by Council Sep 20
- Advanced practice regulatory development being led by HCPC
- Digital transformation strategy in development, quick wins implemented eg e- hearing bundles
- Potential delay to regulatory reform due to change in government approach - risk HCPC may not be a priority regulator
- Changes to UK health and education landscape as a result of pandemic

Risk Appetite

The most appropriate risk appetite statement is compliance - The Council takes a minimal approach to compliance and regulatory risk. We will meet the law, regulations or standards in place to protect the public and employees and to protect data.

External environment particularly changeable due to pandemic. We expect to reach target level of risk when our insight and intelligence function is embedded, expected in 2021-22.

Current risk level is outside of risk appetite

Mitigations in place

1) SMT relationship building and liaison with key stakeholders particularly Government Departments, professional bodies, other regulators and suppliers

2) Horizon scanning and intelligence gathering including from relationship building to be aware of external drivers and influencers

3) Continued investment through major project process for the development of business processes and systems

4) Publication of FtP, Education and Registration information and datasets through annual reports and FOI requests

5) Early planning and scenario development as pandemic response changes within UK and globally.

6) Continued collaboration with other regulators, for example MOUs or joint statements

Planned mitigations 2020-21 / progress

1) Delivery of Communications & Engagement Strategy and communications workplan (Comms, ongoing to Q4)
— Luther Pendragon supporting comms team to reposition HCPC comms approach, Council to agree strategy Dec 20

2) Delivery of research programme set out in Policy & Standards workplan (Policy, ongoing to Q4)
— EDI, AP and Professionalism research underway, registrant wellbeing delivered.

3) Review of the SOPs (Policy Q1-3)
— Timeline extended due to pandemic, due for Council approval Dec 20

4) Insight and Intelligence function scope defined and implemented (Q1-4) (Policy)
— Scope defined. consideration of wider HCPC data approach resulted in delays. Team to be recruited in Q3-4

5) Development of prevention agenda (Q1-4) / Professionalism and upstream regulation lead recruited (Q1) (ED Policy and ER)
— Council to agree framework Sep 20. Lead in place

6) Develop new corporate strategy with engagement & dissemination to key stakeholders of final plan (SMT, from Q2 to Q4)
— Approach and timescale agreed by Council, due to approve in Dec 20

Reporting period commentary

o As the new format for the register has been applied the content has been updated, in particular planned mitigations for 2020-21 and the elements of risk section
o External environment particularly changeable due to pandemic
o Whilst we are working to anticipate future needs of regulation, for example AP, prevention new education model, these are all in planning stage and not reducing risk score yet.

Strategic risk 3 - Failure to be a trusted regulator and meet stakeholder expectations

	Review date	Risk owner
	Sep-20	SMT Lead - Executive Director of Regulation

Risk summary

This risk includes the management of stakeholder engagement and key relationships as well as reputation management.

	Impact		Liklihood	Risk Score
Inherent risk	5	x	3	**15**
Current risk	4	x	2	**8**
Target risk (planned mitigations in place)	2	x	2	**4**

no change from June 2020

Current risk influencers

- ✚ HCPC not meeting a number of PSA standards
- ▬ Corporate Strategy engagement underway with key stakeholders
- ▬ Positive feedback on HCPC responsiveness during pandemic
- ▬ Prevention agenda framework in development, to be approved by Council Sep 20
- ▬ Advanced practice regulatory development being led by HCPC
- ▬ Communications supported by external specialist consultancy - strategy being developed
- ▬ Following internal process change, 100% complaint responses meeting response target
- ✚ Increased awareness of societal inequalities putting focus on HCPC's EDI culture
- ▬ Plan & resource in place to enhance HCPC EDI practice

Risk Appetite

The most appropriate risk appetite statement is communication - the Council is open to communicating and taking decisions, even when this may be unpopular, to further public protection.

We will not meet the target risk until PSA standards are regained given this reputational impact

Current risk level is outside of risk appetite

Mitigations in place

1) Communications Strategy, underpinned by stakeholder communications and engagement plan with clear deliverables and milestones

2) Adherence to agreed processes and organisational values of transparency, collaboration, responsiveness, high quality service and value for money

3) Regular stakeholder opinion polling to understand needs and expectations

4) Management and response to complaints handling, including Freedom of Information and Subject Access Requests

5) Engagement with appropriate organisations including for example other regulators, Government, professional bodies, trade unions and service user organsiations

6) Analysis and action planning from feedback mechanisms including corporate complaints, FtP stakeholder surveys, stakeholder opinion polling and education provider survey

Planned mitigations 2020-21 — progress

1) Delivery of Communications & Engagement strategy and stakeholder workplan (Comms, Q2 to Q4)
→ Luther pendragon supporting comms team to reposition HCPC comms approach, Council to agree strategy Dec 20

2) Development of prevention agenda (Q1-4) / Professionalism and upstream regulation lead recruited (Q1) (ED Policy & ER)
→ Council to agree framework Sep 20. Lead in place

3) PSA standard improvement action plan (PSA Action Plan Working Group) (Q1-4)
→ Group meeting regularly, action plans for each standard agreed by SMT

4) Data and Intelligence function scope defined and implemented (Q1-4) (Policy)
→ Scope defined. consideration of wider HCPC data approach resulted in delays. Team to be recruited in Q3-4

5) EDI strategy developed, annual action plan implemented (led by Policy Q1-4)
→ Council have provided feedback on developing strategy. Due for approval Dec 20

Reporting period commentary

o As the new format for the register has been applied the content has been updated, in particular planned mitigations for 2020-21 and the elements of risk section.
o Ongoing failure to meet all PSA standards will keep this risk above 'low' as this is a key factor for our reputation
o Several positive workstreams with potential to enhance our reputation are in development but it is too early for these to reduce our risk score in this area. Extensive engagement with stakeholders on the corporate strategy will commence post Sep 20 Council.
o ED of Regulation designated SMT Lead for this risl. Post currently vacant and covered by CEO. Appointment has been made anticipate post holder in place before end of 2020.

Strategic risk 4 - Failure to be an efficient regulator

Review date	**Risk owner**
Sep-20	SMT lead - Chief Executive

Risk summary

This risk includes the operational failure of processes, or the inability to manage data efficiently as well the vulnerability of IT security. It also includes financial security, timely and accurate reporting and the recruitment, retention and training of Partners and employees.

	Impact		Liklihood	Risk Score
Inherent risk	5	x	5	**25**
Current risk	4	x	3	**12**
Target risk (planned mitigations in place)	2	x	2	**4**

reduction from June 2020

Current risk influencers

- ✚ Fee increase not yet secured, expected Dec 20 / Longer term fee strategy not developed
- ✚ Deficit forecasted in next financial year
- ▬ Costs of COVID response to be met by grant
- ▬ Financial Strategy & reserves policy agreed by Council / New financial modelling in test
- ✚ Potential delay to regulatory reform due to change in government approach (ability to introduce more efficient processes and manage own fee levels)
- ▬ Employee sickness and turnover significantly down
- ✚ Productivity impacted by 100% home working / Phased planning for return to office over Q3
- ▬ HCPC passed ongoing ISO 27001 audit and achieved cyber essentials certification
- ▬ Digital transformation strategy in development, quick wins implemented eg e- hearing bundles

Risk Appetite

The most appropriate risk appetite statement is financial - The Council takes a minimal approach to incurring financial loss. We are funded by registrants' fees and need to deliver value for money. We will allocate additional resource in areas where not to do so incurs greater risk or there are compelling benefits. We tend to favour investments that offer low returns but low volatility and risk.

Target will not be reached until we secure the fee rise (Dec 20) and technology is improved through digital transformation. In the longer term regulatory reform will enable more efficient regulation and powers on fee levels est 2022-23.

Current risk level is outside of risk appetite

Mitigations in place

1) Adherence to operational processes and policies which are subject to internal and external audit

2) Adherence to budgeting and financial management and reporting processes which are subject to internal and external audit eg NAO

3) Adherence to HR processes in relation to recruitment, annual performance development review and learning and development for Partners and employees

4) Effective IT system design maintaining confidentiality, integrity and availability of data

5) Maintenance of ISO27001 Information Security standard which is subject to external audit / Regular independent security assessments of key IT infrastructure

6) Continuous quality improvement quality assurance audits

7) Maintenance of business continuity infrastructure and processes

8) SMT monthly monitoring of productivity of all departments through detailed performance reporting, Council /Committee monitoring through KPIs

Planned mitigations 2020-21 / progress

1) Delivery of well being agenda (HR/Comms, ongoing to Q4) — Initiatives in place and in development

2) Delivery of systems projects including registration transformation (Projects, ongoing to Q4) — Reg project expected to deliver to plan in Oct 20

3) New financial modelling developed (Finance Q1-3) — new model in place and ongoing testing

4) Explore more effective recruitment and retention practices (HR Q1-4) — Development of FTP apprentice scheme underway

5) Organisational restructuring (SMT Q1-3) — restructures of FTP, Communications, HR and Finance complete. SMT perm structure plan being implemented

6) Review of partners remuneration and e learning and improved partner training opportunities HR (Q1-4) — review of remuneration due for presentation Dec20

7) Digital transformation strategy developed (IT Q1-2) — Delay to start due to pandemic but now well underway, due to be approved by Council Dec 20, quick wins being implemented

Reporting period commentary

o As the new format for the register has been applied the content has been updated, in particular planned mitigations for 2020-21 and the elements of risk section.
o Residual risk has reduced due to increased confidence in our financial modelling capabilities and IT efficiency through rapid implementation of quick win solutions.
o 100% homeworking also impacts on efficiency as unable to hold all hearings remotely, and home set up not as efficient as in office (eg 2 screens for data inputting, regular post, phone lines)
o There has been good progress in developing the new financial modelling and digital transformation.

Strategic risk 5 - Failure of leadership, governance or culture

	Review date
	Sep-20

	Risk owner
	Chair & SMT **Lead - Chief Executive**

Risk summary

This risk includes the effectiveness of Council, strategy setting and oversight, risk management and business planning. It also covers organisational culture including the existence of relevant policies for whistleblowing or anti-bribery for example and processes for performance development.

	Impact		Liklihood	Risk Score
Inherent risk	4	x	3	12
Current risk	3	x	3	9
Target risk (planned mitigations in place)	2	x	2	4

reduction from June 2020

Current risk influencers

- ✚ Organisation currently without a strategy
- ▬ Clear plan and timeline in place to develop and approve new strategy - Dec 20
- ▬ Corporate plan july-december 20 agreed by Council providing focus to change activity
- ✚ Organisation full remote working and impact on culture
- ✚ Increased awareness of societal inequalities putting focus on HCPC's EDI culture
- ▬ Plan & resource in place to enhance HCPC EDI practice
- ✚ SMT includes several temporary roles
- ▬ Plan in place to move to permanent SMT structure

Risk Appetite

The most appropriate risk appetite statement is compliance - The Council takes a minimal approach to compliance and regulatory risk. We will meet the law, regulations or standards in place to protect the public and employees and to protect data.

Current risk is acceptable as mitigation will be in place to reduce in the short to medium term (by end Q4 2020-21)

Current risk level is outside of risk appetite

Mitigations in place

1) Robust and effective Council recruitment processes with appointment against competencies, member induction and annual appraisal process

2) Well researched and drafted Council & Committee papers with clear, well reasoned decision making

3) Training and internal communications to ensure Partners, Council and employees aware of and sensitive to issues including whistleblowing, anti-bribery, equality and diversity

4) SMT oversight of HR and internal communications work to support the development of our culture and environment as well as delivering continuous improvement through all employee survey

5) Robust audit plans, regular review of risks

6) Adherence to relevant internal policies including for example code of corporate governance, conduct, declaration of interest, anti-bribery, whistleblowing, fraud (includes mandatory all employee e-learning modules) and continued engagement with cross-organisational groups including the Employee Forum and Corporate Social Responsibility

7) SMT: meetings held regularly, with well drafted papers and clear decision making communicated; visibility and transparency achieved with meeting papers online and regular cascade of information

Planned mitigations 2020-21 / progress

1) Develop new corporate strategy with engagement & dissemination to key stakeholders of final plan (SMT, from Q2 to Q4) — Approach and timescale agreed by Council, due to approve in Dec 20

2) CEO leading internal working group on future HCPC culture (CEO Q3-4) — Group meeting regularly

3) Review of committee governance structure by SCM (from Q1) — Council will consider recommendations Sep 20

4) Review of whistleblowing policy and processes (Governance Q1-2) — Review will complete in Q3

5) Review of Council skill matrix, competencies and appointment process (Governance Q2-3) — Matrix review complete, review of competencies and appointment process will commence in Q3

6) Risk management system review project (Governance from Q1) — Delayed start but plan presented to Audit Committee Sep 20

7) EDI strategy developed, annual action plan implemented (led by Policy Q1-4) — Council have provided feedback on developing strategy. Due for approval Dec 20

8) Succession plan to be reviewed and developed (HR Q2-4) — Council presentation Dec 20

9) Council apprentice scheme - increase diversity of views on the board (Governance Q3-4) — Plans to be approved by Council Sep 20, apprentice in place by end of 2020

Reporting period commentary

o As the new format for the register has been applied the content has been updated, in particular planned mitigations for 2020-21 and the elements of risk section.
o The residual score has reduced from 10 to 9 following reflection on the current risk of impact. This is because the HCPC now has a permanent Chief Executive and expertise in IT transformation plans for the permanent SMT structure are well developed and being put in place. A timeline and plan for developing a new corporate strategy is now in place and progressing as expected. Additionally the organisations work on EDI has been accelerated with dedicated Policy resource and the recruitment of EDI subject matter expertise.

RISK MATRIX DEFINITIONS

IMPACT TYPES

Public Protection	Financial	Reputation
Catastrophic 5	**Catastrophic 5**	**Catastrophic 5**
A systematic failure for which HCPC are ultimately responsible for, exposes the public to serious harm in cases where mitigation was expected.	Unfunded pressures greater than £1 million	Incompetence/ maladministration or other event that will destroy public trust or a key relationship
Significant 4	**Significant 4**	**Significant 4**
A systematic failure for which HCPC are ultimately responsible for, exposes more than 10 people to harm in cases where mitigation was expected.	Unfunded pressures £250k - £1 million	Incompetence/ maladministration that will undermine public trust or a key relationship for a sustained period or at a critical moment.
Moderate 3	**Moderate 3**	**Moderate 3**
A systemic failure for which HCPC are ultimately responsible for exposes more than 2 people to harm in cases when mitigation was expected.	Unfunded pressures £50,000 - £250,000	Incompetence/ maladministration that will undermine public trust or a key relationship for a short period. Example Policy U-turn
Minor 2	**Minor 2**	**Minor 2**
A systemic failure which results in inadequate protection for individuals/individual communities, including failure to resolve high profile cases.	Unfunded pressures between £20,000-£50,000	Event that will lead to widespread public criticism.
Insignificant 1	**Insignificant 1**	**Insignificant 1**
A systemic failure for which fails to address an operational requirement	Unfunded pressures over £10,000	Event that will lead to public criticism by external stakeholders as anticipated.

IMPACT

LIKELIHOOD AREAS

Strategic	Programme / Project	Operational
Probable 5	**Probable 5**	**Probable 5**
"Clear and present danger", represented by this risk - will probably impact on this initiative - sooner rather than later.	Likely to occur in the life-cycle of the project, probably early on and perhaps more than once.	The threat is likely to happen almost every day.
Possible 4	**Possible 4**	**Possible 4**
Likely to happen at some point during the next one or two years.	Likely to happen in the life-cycle of the programme or project.	May well happen on a weekly basis.
Unlikely 3	**Unlikely 3**	**Unlikely 3**
May well occur during the lifetime of the strategy.	May occur during the life of the programme or project.	May well happen on a monthly basis.
Rare 2	**Rare 2**	**Rare 2**
Only small chance of occurring in the lifetime of the strategy.	Not likely to occur during the lifecycle of the programme of project.	Does not happen often - once every six months.
Negligible1	**Negligible1**	**Negligible1**
Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.

LIKELIHOOD

Risk = Impact x Likelihood
Low risk = 1 to 5; Meduim risk = 6 to 10, High risk = 11 to 25