

Finance & Resources Committee – 17 March 2011

Registration Department Work Plan 2011 - 2012

Executive summary and recommendations

Introduction

The attached document is the Registration Department's proposed work plan for 2011 – 2012. It details the key objectives, the main areas of work and what we intend to develop within the registration area over the next financial year.

Decision

The Committee is asked to agree the attached Registration Department work plan.

Background information

This document is intended to supplement the Council's strategic intent document and sits alongside other departmental level strategy and work plan documents such as Communications, Finance, IT, Projects, Education, Policy & Standards, Human Resources and Fitness to Practise.

It is a working document and is therefore always under review.

Resource implications

See attached work plan.

Financial implications

See attached work plan.

Appendices

Registration Department Work Plan 2011 – 2012.

Date of paper

6 March 2011

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2010-03-05	a	REG	PPR	Registration work plan	Draft	Public
					DD: None	RD: None

Registration Department

2011 – 2012 Work Plan

Richard Houghton

March 2011

Registration Department Work Plan 2011 - 2012

Contents

Introduction	3
The Registration Department	3
This document	4
Priorities 2011 – 2012.....	4
Resources	4
Risk management.....	5
Registration Department main operational activities.....	5
Supporting activities	6
1) Partner assessor recruitment, selection and training.....	6
2) Information systems (database and electronic records)	6
3) Liaison with stakeholders	6
4) Committee and Council work.....	6
5) Publications	6
Achieving the Registration Department objectives 2011 – 2012	8
Registration Objective - Improve quality of service.....	8
Registration Objective - Effective capacity planning	8
Registration Objective – Deliver application verification checks	8
Registration Objective - Employee development.....	9
Registration Objective – Develop external relationships with suppliers.....	9
Registration Objective - Manage projects within agreed timescales.....	10
Priorities 2012 – 2013	11
Registration Department activities in 2010 – 2011	12
Registration Objective – Manage business within the agreed service standards	12
Registration Objective – Improve quality of service	12
Registration Objective – Effective capacity planning	12
Registration Objective – Improve application verification checks.....	12
Registration Objective – Employee development	13
Registration Objective – Manage projects within agreed timescales	13
Appendices	
Appendix one Registration Department processes and service standards...	14
Appendix two UK application volumes.....	15
Appendix three Renewal volumes.....	16
Appendix four Registration Department activities table 2011 – 2012.....	17
Appendix five Registration Department objectives table 2011 – 2012.....	18
Appendix six Risk Register risk items mitigated by the Registration Department..	23

Introduction

Providing a high level of customer service is crucial to the long term success of the Health Professions Council (HPC) and demonstrates our commitment to all of our stakeholders - registrants, members of the public, our employees, our suppliers and the elected members of our Council. As the standard of customer service increases in other service sectors such as financial services, telecommunications, local government, retail and leisure so does the service quality expectations of their customers. Similarly, HPC's 'customers' will continue to have higher expectations of their own customer service experience which includes having a wider range of service delivery options, with customers wanting more choice of how they interact with us. Coupled with this increased expectation of service delivery is an increase in registrant number growth. Registrant numbers have increased at an average rate of 5% per year over the last five years and with the regulation of professions such as practitioner psychologists and hearing aid dispensers the demand for these services has increased.

It is clear that we need to continue to develop our customer service delivery strategy that is based on the present and future needs and expectations of stakeholders. It is also important to maintain the positive, pride of workmanship, feeling of community, enjoyable and fun working environment that exists at HPC as customer satisfaction generally moves in the same direction as employee satisfaction.

The 2011 - 2012 registration work plan builds on our previous achievements. Employing the best people in a good working environment and supporting them with ongoing training, reliable equipment and up-to-date systems. Recognising individuals and teams by promoting from within wherever possible and encouraging everyone to enjoy rewarding careers and provide job satisfaction. The continued investment in technology to reflect business rules and processes will speed up processing, improve job satisfaction and offer our customers more service delivery channels.

It is important to remember that it is the continuation of a journey in registration.

The Registration Department

The Registration Department sits within the Operations Directorate of the HPC.

The Registration Department's main responsibilities are:

- processing application forms from individuals who have undertaken an approved course in the UK;
- processing applications for readmission to the Register;
- processing registrants registration renewal forms;
- processing international / EEA application forms;
- processing grandparenting application forms;
- processing incoming general correspondence including letters, requests for de-registration, change of addresses;
- co-ordinating continuing professional development (CPD) profile assessment days;

- replying to emails; and
- answering incoming telephone calls with call types relating to the above mentioned processes.

This document

This document aims to set out the work priorities for the financial year April 2011 – March 2012, and provide a basis against which the work of the Registration Department can be planned and measured.

This work plan attempts to show how the standard operational work and the planned projects have been scheduled to ensure successful completion, given the resources and time table. The Registration Department is both proactive and reactive in its work so the requirements may change, particularly in light of business needs, for example the recent publication of the Government's command paper 'Enabling Excellence' is likely to impact the planned work outlined in this document. **The department will therefore need to be flexible in the delivery of its work plan in order to respond accordingly. This document will be kept under review.**

Priorities 2011 – 2012

The main priority for the department is the day-to-day operation of the registration processes. For this year, this includes the preparation for the expected transfer of the General Social Care Council Register to HPC. The department will also be involved in a number of projects at both an operational level and a more strategic level.

Resources

This work plan is based on a budget of £1,898,360 which allows for a team of 37 registration employees which represents no increase in the year on year headcount. The registrant statistics included in the 'Finance and Resources Committee paper - HPC's Registration and Application numbers model', dated 27 January 2011, have been utilised to determine the Registration Department resource requirements for 2011 - 2012.

The 37 Registration Department employees consist of: one Head of Registration, three Customer Service Managers, three Team Leaders and 30 Registration Advisors.

Recruiting and retaining employees, in order to work effectively and proactively, continues to be a big challenge for the department and is likely to remain a risk for this financial year.

The department structure consists of two service teams now primarily providing front line customer service for the UK, international, CPD and grandparenting processes and a support team primarily dealing with the renewals and application entry processes. There has been a significant amount of investment in cross

training of registration advisors and this has enabled the department to respond rapidly and effectively to the significant increases in demand that is received.

Risk management

The Registration Department manages those organisation risks that are primarily concerned with:

- customer service failures;
- inability to detect fraudulent applications;
- backlog of registration applications;
- mistakes in the registration process leading to liability for compensation to the registrant or applicant;
- CPD processes not effective.

Activities outlined in this work plan also help mitigate organisation risks managed by other departments and Appendix six details all the risks that are mitigated by the Registration Department. As part of the HPC equality and diversity scheme the Registration Department will also continue to scrutinise and screen our processes and work to make sure that we identify and, where possible, mitigate any adverse impact to some groups, compared to others. Please see Appendices four, five and six for more details and links between the HPC's risk register and this work plan.

Registration Department main operational activities

There are 11 main processes which generate the majority of the department's workload and the volumes for each process vary throughout the year with significant peaks and troughs in demand for any individual process. Appendices two and three illustrate this change in demand for the UK application and renewals processes. The department continues to ensure it delivers the best possible service to registrants, applicants and the public by cross training all registration advisors to deliver all registration processes efficiently and effectively within our service standards. The 11 main operational processes are detailed further in Appendix one together with the current service standards which will be reviewed as part of this work plan.

Supporting activities

There are five activities which support the main Registration Department processes. Whilst these activities provide a solid and desirable foundation onto which to operate our main processes, at certain times of the year some of them do not take priority and some activities, may, if resources are stretched need to be revisited in their totality. The following paragraphs summarise these activities.

1) Partner assessor recruitment, selection and training

In 2011 – 2012, the department will work with the Partners Department to ensure registration assessor numbers are maintained and appropriate for the planned operational processes. This will include the selection, recruitment and training of new registration assessors to fill identified gaps.

There will also be refresher training for the existing 165 registration assessors in 2011 – 2012. This will include training on the Health Professions Order and operational processes. We will also continue to assist the Partners Department with the delivery of the registration assessor performance appraisal system.

2) Information systems (database and electronic records)

In 2011 – 2012, the department will work with the IT Department to both enhance and revise the registration IT systems. It is the current intention to implement the following changes to the registration IT systems this financial year:

- **Photographs on registration cards** – Development to incorporate registrants' photographs on their registration card.
- **DocXP enhancement – capture of equality and diversity information for new professions** – Enhancement to the DocXP software to enable HPC to capture equality and diversity information for new professions.
- **Return mail flag** - Enhancement to NetRegulate to include a returned mail flag field.

3) Liaison with stakeholders

In 2011 – 2012, the department will continue to work with stakeholders (eg general public, professional bodies, and registrants) in the broad area of registration. The department will endeavour to support the Communications Department with representation at conferences, listening events, employer events and various presentations which also provides valuable experience for registration employees and the department as a whole.

4) Committee and Council work

In 2011 – 2012, the department will continue to work with the Finance and Resources Committee, the Education and Training Committee and Council. We will ensure that they are kept up-to-date with operational performance and approval for appropriate changes to existing processes and the introduction of new processes is gained in a timely, robust and cost effective manner.

5) Publications

The department is responsible for producing a number of publications, including the Continuing Professional Development (CPD) annual report, registration certificate,

and the UK, international, grandparenting application forms and guidance notes. These documents are updated and reviewed regularly.

The table in Appendix four details the Registration Department's core activities together with details of which item on the risk register they mitigate.

Achieving the Registration Department objectives 2011 – 2012

We have identified a number of objectives that will require action and completion in 2011 – 2012.

Registration Objective – Improve quality of service

Customer service is an important aspect of any organisation as it can support the health and growth of that business. The Registration Department will continue to build upon the foundations already in place and improve the service we deliver by ensuring that we:

- 1) conduct, deliver and review the quality checks programme providing registration advisors with individual feedback in regular 1 to 1 meetings and enabling the department to identify any recurring process failures;
- 2) develop and publish revised Registration Department service standards;
- 3) conduct, deliver and review the call monitoring process to deliver individual feedback to registration advisors;
- 4) continue to facilitate a customer research programme to:
 - gain an in-depth insight into the overall customer service experience from a registrant viewpoint;
 - gain qualitative feedback on call handling quality;
 - have a clear basis for making decisions about future service developments;
 - deliver improvements identified.

Registration Objective – Effective capacity planning

To ensure that we effectively plan the use of our resources we will:

- 1) continue to develop our capacity planning process to accurately forecast workload.

Registration Objective – Deliver application verification checks

It is incumbent upon us to ensure the integrity of our Register, including taking steps to prevent fraudulent or erroneous entry to the Register. We already have processes in place for checking qualifications, identity and professional standing.

We will aim to improve our verification process by:

- 1) investigating the possibility of requesting all applicants from overseas, apart from those seeking to exercise mutual recognition rights under the EC Professional Qualification Directive, to attend HPC's offices with original identity and qualification documents and reduce the risk of exposure to identity theft and fraud;
- 2) identify a document verification specialist trainer and arrange for this training to be delivered to the Registration Department;
- 3) enhance our verification database by continuing to store examples of valid worldwide competent authority contact details, educational institutions and verification documentation;
- 4) continue to work with NHS Counter Fraud and Security Management Services (NHSCFSMS) to conduct a fraud measurement exercise aimed at

validating the qualifications of allied health professionals currently registered with the HPC.

Registration Objective – Employee development

Our employee development policy needs to aim to ensure that we place the right people in the right role and we invest in their recruitment, training and development by:

- 1) arranging for all registration employees to gain an accredited customer service qualification;
- 2) develop customer service training to improve skills to deal with more challenging situations;
- 3) developing and delivering the long term training plan;
- 4) continuing to review the registration advisor training manual and introduce a full learning management system which will enable the Registration Department to develop and deliver its training online;
- 5) continuing to cross train all registration advisors.

Registration Objective – Develop external relationships with suppliers

The Registration Department is reliant on a number of key suppliers in order to deliver and improve the service that it delivers. The department needs to continue to develop good working partnerships with these suppliers to ensure a seamless and improved service is delivered in a cost effective manner. The department needs to ensure:

- 1) Europa Quality Print Ltd print all registration renewal forms, registration application forms, publication material, letters and registrant certificates effectively and efficiently. A formal tender process will be undertaken for all the Registration Department's printing requirements during this financial year;
- 2) Maintel provide effective technical maintenance support for the Registration Department's telephony system and provide recommendations on how we can utilise our existing technology more effectively;
- 3) Sevicepoint scan and copy all registration renewal and application forms effectively and efficiently.

Registration Objective - Manage projects within agreed timescales

The following part of the document provides a summary of the projects that are planned or anticipated to be undertaken in the financial year 2011-2012. The project delivery timescales are driven by resource constraints (both internal and external), legislative deadlines, business need, and government decisions. The Registration Department is heavily impacted by these factors and hence its work priority may change, particularly in light, for example of the recent publication of the Government's command paper 'Enabling Excellence' which is likely to impact the planned project work outlined in this document.

It is currently planned that the following projects will be resourced over the coming financial year:

- 1) **General Social Care Council (GSCC)** - Project dealing with the transfer of the GSCC's Register to the HPC;
- 2) **Practitioners of herbal medicine and traditional Chinese medicine** – Project dealing with the regulation of these professions;
- 3) **Independent prescribing for paramedics** – Allow the HPC to annotate the Register;
- 4) **Independent prescribing for chiropodists / podiatrists and physiotherapists** – Upgrade NetRegulate to allow the Register entries of physiotherapists and chiropodists successfully completing independent prescribing programmes to be annotated on the Register;
- 5) **Post-registration qualifications** – Allow the Register entries of podiatrists and / or practitioner psychologists to be annotated as podiatric surgeons or neuropsychologists;
- 6) **Outcome to modernising scientific careers** – Project dealing with the potential regulation of healthcare scientists;
- 7) **Psychotherapists and Counsellors** – Project dealing with the potential regulation of psychotherapists and counsellors;
- 8) **Online UK applications** – Extend the HPC's current online service delivery options to include the facility for UK graduates to apply for registration online.

The table in Appendix five sets out the Registration Department's day to day activities in the delivery of the registration objectives.

Priorities 2012 – 2013

2012 – 2013 will be a year in which we continue to undertake our established activities and improve our processes and service delivery. Taking on new professions that are anticipated up to 2013 such as dance movement therapists, counsellors and psychotherapists and healthcare scientists will have a significant impact on the workload of the Registration Department.

The Registration Department will begin project work in identifying a new Registration Department database to replace the current NetRegulate system. We will also explore the possibility of using text messaging and bulk emailing as communication channels.

Registration Department activities in 2010 - 2011

It would be useful to review the activities contained in the work plan which was submitted one year ago as part of the background which has formed the basis of this new work plan. Six objectives were set and the progress of each is detailed below:

Registration Objective – Manage business as usual activities within agreed service standards

This objective was met. Service standards were met or exceeded throughout the year.

Registration Objective – Improve quality of service

This objective was met. A quality checks programme was in operation with call monitoring, application entry and renewal processing checks undertaken and feedback given to registration advisors. A Registration Department satisfaction survey was conducted which provided an in depth insight into the overall service experience from a registrant viewpoint.

Registration Objective – Effective capacity planning

This objective was met. Specialist contact centre planning training has enabled the development of the capacity planning process which has enabled the Registration Department to deliver improved performance over the past twelve months.

Registration Objective – Improve application verification checks

This objective was met. Over the last year particular focus in this regard has been on verifying the identity, qualifications and registration of international applicants. Some activities are outlined below:

- In order to verify applicants from overseas details HPC undertake to check the validity of their identification and qualifications. All passports are checked using an online database. The database includes descriptions and images of more than 2,000 passports, driving licences and ID cards from over 190 countries. It also covers their most important security features.
- In order to check the authenticity of applicant's qualifications the Registration Department contacts the awarding institution to confirm that the applicant successfully completed their declared educational programme(s) in the timescales given. In order to assist with the verification of education providers and programme(s) we use two further online databases, one that confirms that the education provider is accredited and one that provides information regarding known 'diploma mills' and other unaccredited organisations. Should the HPC have difficulty in confirming any of the above a contract has been arranged with Kroll, a background screening organisation with global capabilities, to undertake these checks on our behalf.

- As part of our verification process the HPC will also contact known regulatory bodies if the applicant has practised overseas to check their professional status.
- The HPC have continued to participate in the rollout of the Internal Markets Information System (IMI) and practitioner psychologists are now also involved with this initiative.
- HPC have entered into an agreement with NHSCFSMS to conduct a fraud measurement exercise aimed at validating the qualifications of allied health professionals currently registered with the HPC. NHSCFSMS have commenced this work and have attempted to check and validate each registrant's declared qualifications who gained HPC registration in June 2009.

Registration Objective – Employee development

This objective was partially met. A number of new registration employees have not had the opportunity to gain an accredited customer service qualification but will be given this opportunity over the forthcoming twelve months. There is a long term training plan in place to ensure that we continue to cross train all registration employees. There is a detailed training manual in operation which is constantly reviewed and updated but a full learning management system now needs to be delivered online.

Registration Objective – Manage projects within agreed timescales

The progress the department made against each of the planned projects in 2010 – 2011 is detailed below:

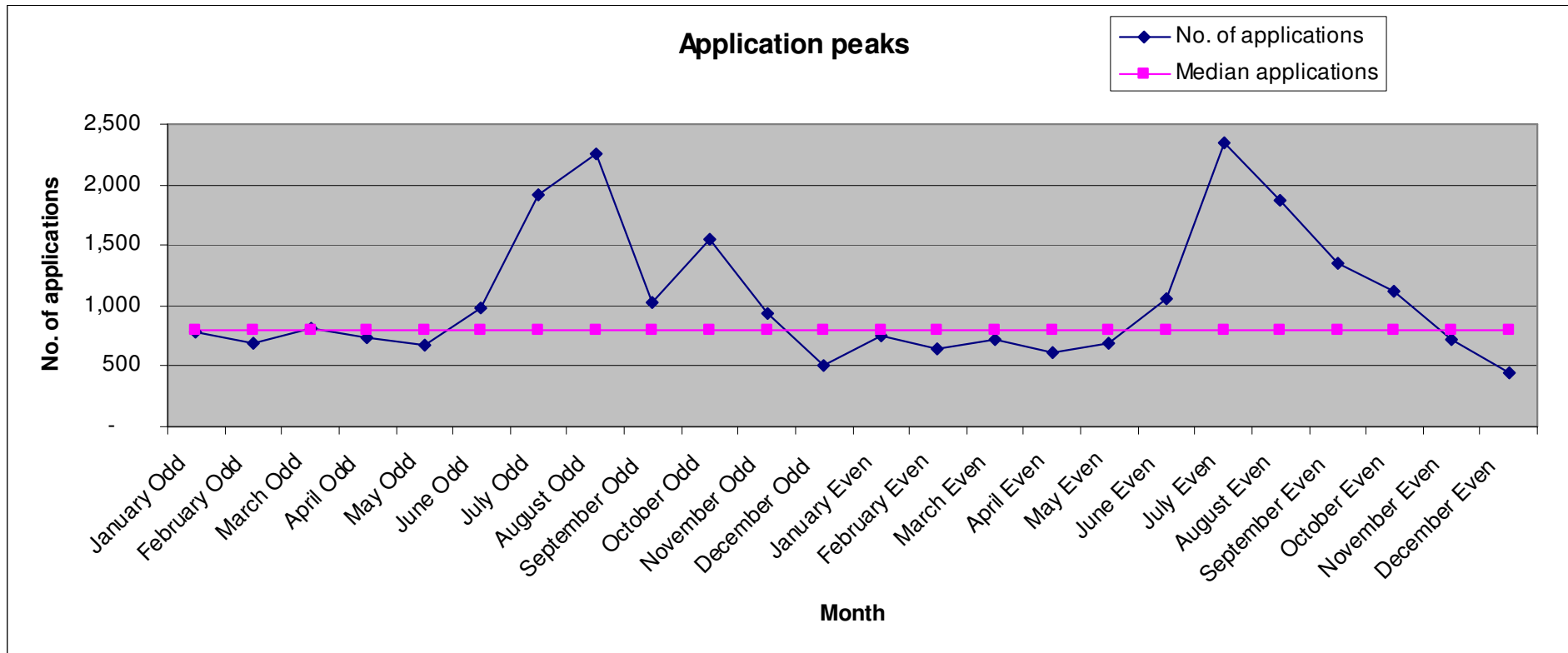
- 1) **Hearing Aid Council** – The transfer of statutory regulation of hearing aid dispensers to HPC was delivered.
- 2) **Linking Register to Electronic Staff Records (ESR) project** - This project was postponed.
- 3) **Registration fee change 2011** - This project was cancelled.
- 4) **Registrant publication preferences** – The department completed all assigned objectives in the project plan on time.
- 5) **Vetting and Barring Scheme phases 1 and 2** - This project was postponed.
- 6) **Registration / Education Department liaison project** – On track for completion in March 2011.
- 7) **Credit card handling outsourcing** – The department completed all its assigned objectives in the project plan on time.
- 8) **Partner systems review** – This project was postponed.

Appendix one – Registration Department processes and service standards

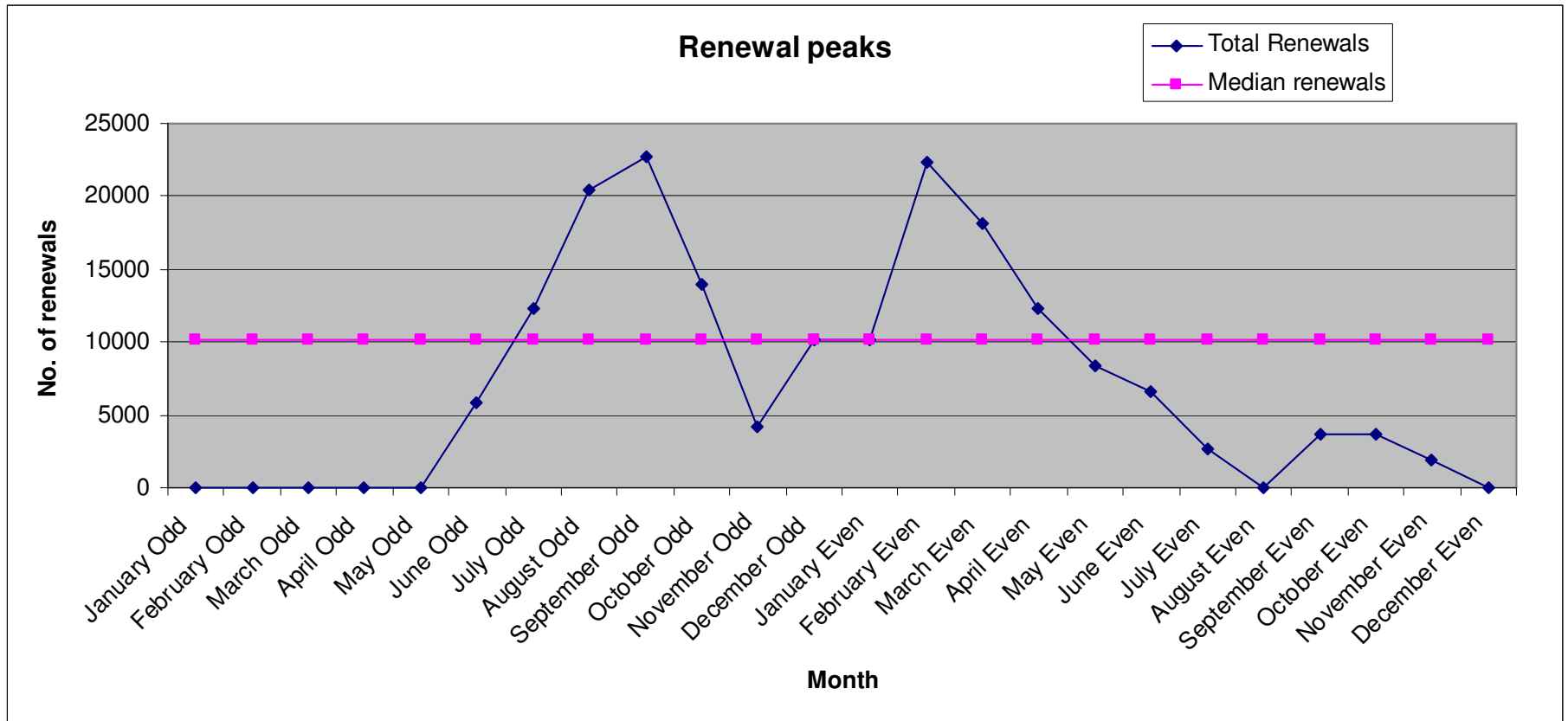
It should be noted that these service standards will be reviewed in 2011 – 2012 and are likely to be changed.

Process	Service standards 2011 – 2012
UK applications	Ten working days processing
Readmissions	Ten working days processing
International / EEA applications	Processed within three months of receipt of all documents
Grandparenting applications	Processed within three months of receipt of all documents
Continuing Professional Development (CPD) audits for the following professions in 2011 / 2012: <ul style="list-style-type: none"> paramedics; orthoptists; clinical scientists; prosthetists & orthotists; speech and language therapists; occupational therapists; biomedical scientists; radiographers; physiotherapists; arts therapists. 	Processed within three months of receipt of all documents
Renewal batch letters sent on time for the following professions in 2011 / 2012: <ul style="list-style-type: none"> practitioner psychologists; paramedics; orthoptists; clinical scientists; prosthetists & orthotists; speech and language therapists; occupational therapists; biomedical scientists; radiographers; physiotherapists; arts therapists. 	Renewal notice sent not less than three months before publicly published renewal dates Final renewal notice sent not less than one month before publicly published renewal dates
Renewal cycle batch processing	Complete renewal (lapsing) process run within five days of publicly published dates
Written complaints	18 days response
Emails	48 working hours response
Telephone call answering	80% of calls answered within 30 seconds
Process equality and diversity data for new applicants to the Register	Ten working days processing

Appendix two – UK application volumes



Appendix three – Renewal volumes



Appendix four Registration Department activities table 2011 – 2012

The table below sets out the Registration Department's core activities.

Activity	Mitigate risk register item	Start date	Completion date	Lead
Manage the Registration Department's main operational processes within service standards	2.3, 1.5, 10.1, 10.4	1 April 2011	Ongoing	RH, CH, AL, DW
Partner assessor recruitment, selection and training	6.1	1 April 2011	Ongoing	DW, AL
Information systems enhancements and revisions	10.1	1 April 2011	Ongoing	RH, CH, AL, DW
Liaison with stakeholders	3.2	1 April 2011	Ongoing	RH, CH, AL, DW
Committee and Council work	4.1	1 April 2011	Ongoing	RH, CH, AL, DW
Improve Registration Department publications	10.5	1 April 2011	Ongoing	RH, CH, AL, DW

Key

RH - Richard Houghton

CH - Claire Harkin

AL – Anna Lubasinska

DW – David Waddle

Appendix five Registration Department objectives table 2011 – 2012

The table below sets out the Registration Department's objectives.

Objective	Activity	Mitigate risk register item	Start date	Completion date	Lead
Improve quality of service	1) Conduct, deliver and review the quality checks programme providing registration advisors with individual feedback in regular 1 to 1 meetings and enabling the department to identify any recurring process failures;	10.5	1 April 2011	Ongoing	CH, AL, DW
	2) Develop and publish revised Registration Department service standards;	2.3	1 April 2011	Ongoing	RH
	2) Conduct, deliver and review the call monitoring process to deliver individual feedback to registration advisors;	10.1	1 June 2011	Ongoing	CH, AL, DW
	3) Continue to facilitate a customer research programme to; <ul style="list-style-type: none"> • gain an in-depth insight into the overall customer service experience from a registrant viewpoint; • gain qualitative feedback on call handling quality; • have a clear basis for making decisions about future service developments; • deliver improvements identified. 	10.1	1 April 2011	Ongoing	RH

Objective	Activity	Mitigate risk register item	Start date	Completion date	Lead
Effective capacity planning	1) Continue to develop our capacity planning process to accurately forecast workload.	10.1, 10.4	1 April 2011	Ongoing	RH
Deliver application verification checks	1) Investigating the possibility of requesting all applicants from overseas, apart from those seeking to exercise mutual recognition rights under the EC Professional Qualification Directive, to attend HPC's offices with original identity and qualification documents and reduce the risk of exposure to identity theft and fraud;	10.3	1 April 2011	31 March 2012	RH, AL, DW
	2) Identify a document verification specialist trainer and arrange for this training to be delivered to the Registration Department;	10.3	1 April 2011	31 March 2012	RH
	3) Enhance our verification database by continuing to store examples of valid worldwide competent authority contact details, educational institutions and verification documentation;	10.3	1 April 2011	Ongoing	DW, AL
	4) Continue to work with NHS Counter Fraud and Security Management Services (NHSCFSMS) to conduct a fraud measurement exercise aimed at validating the qualifications of allied health professionals currently registered with the HPC.	10.3	1 April 2011	Ongoing	RH

Objective	Activity	Mitigate risk register item	Start date	Completion date	Lead
Employee development	1) Arranging for all registration employees to gain a customer service qualification;	11.4	1 April 2011	Ongoing	RH
	2) Develop customer service training to improve skills to deal with more challenging situations;	11.4	1 April 2011	Ongoing	CH, AL, DW
	3) Developing and delivering the long term training plan;	11.4	1 April 2011	Ongoing	CH,AL, DW
	4) Continuing to review the registration advisor training manual and introduce a full learning management system which will enable the Registration Department to develop and deliver its training online;	11.4	1 April 2011	Ongoing	CH, AL, DW
	5) Continuing to cross train all registration employees.	11.4	1 April 2011	Ongoing	CH,AL, DW

Objective	Activity	Mitigate risk register item	Start date	Completion date	Lead
Develop external Relationships with suppliers	1) Europa print all registration renewal forms, registration application forms, publication material, letters and registrant certificates effectively. A formal tender process will be undertaken for all the Registration Department printing requirements during this financial year;	10.1	1 April 2011	Ongoing	CH
	2) Maintel provide effective technical maintenance support for the Registration Department's telephony system and provide recommendations on how we can utilise our existing technology more effectively;	2.10	1 April 2011	Ongoing	RH
	3) Servicepoint scan and copy all registration renewal and application forms effectively and efficiently.	10.1	1 April 2011	Ongoing	CH, AL, DW
Manage projects within agreed timescales	1) General Social Care Council (GSCC);	8.12	1 April 2011	Ongoing	RH,CH
	2) Practitioners of herbal medicine and traditional Chinese medicine;	8.2	1 April 2011	Ongoing	RH,CH
	3) Independent prescribing for paramedics;	8.2	1 April 2011	Ongoing	RH,CH
	4) Independent prescribing for chiropodists / podiatrists and physiotherapists;	8.2	1 April 2011	Ongoing	RH,CH
	5) Post-registration qualifications;	8.2	1 April 2011	Ongoing	RH,CH
	6) Outcome to modernising scientific careers;	8.2	1 April 2011	Ongoing	RH,CH

Objective	Activity	Mitigate risk register item	Start date	Completion date	Lead
Manage projects within agreed timescales	7) Psychotherapists and Counsellors; 8) Online UK applications.	8.11 10.4	1 April 2011 1 April 2011	Ongoing Ongoing	RH,CH RH,CH

Appendix six Risk Register risk items mitigated by the Registration Department

Risk Register item reference	Description
1.5	Loss of reputation
1.6	Failure to abide by current equality and diversity legislation
2.3	Unacceptable service standards
2.10	Telephone system failure causing protracted service outage
3.2	Loss of support from key stake holders
4.1	Council inability to make decisions
6.1	Inability to recruit and / or retain suitable partners
6.5	Incorrect interpretation of HPO in use of partners
8.2	Failure to regulate a new profession or a post-registration qualification as stipulated by legislation
8.11	Failure to successfully open the Counsellors and Psychotherapist Register
8.12	Failure to successfully open the Social Worker Register
10.1	Customer service failures
10.2	Protracted service outage following a NetRegulate registration system failure
10.3	Inability to detect fraudulent applications
10.4	Backlog of registration applications
10.5	Mistake in the registration process leading to liability for compensation to registrant or applicant
11.4	Lack of technical and managerial skills to deliver the strategy
18.1	CPD processes not effective