

Audit and Risk Assurance Committee

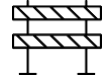

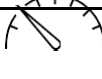





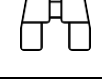





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| Meeting Date | 12 March 2025 |
| Title | Strategic risk register |
| Author(s) | Anna Raftery, Head of Assurance and Compliance |
| Executive Sponsor | Claire Amor, Executive Director of Corporate Affairs |
| Executive Summary <p>The presented report sets out the HCPC's strategic risks as of March 2025.</p> <p>The register details:</p> <ul style="list-style-type: none"> • a description of how the risk relates to the HCPC's risk appetite; • current mitigations in place; • progress on workplans, and how they mitigate the risk; and • a commentary box outlines the changes to the risk since the last iteration (November 2024). <p>The risk score for strategic risks 3 (a and b) has reduced to from 12 (high/medium risk) to 9 (medium risk). This reflects the effectiveness and quality of our data analysis and progression of the work on data quality.</p> | |
| Action required | The Committee is asked to review the information provided and seek clarification on any areas. |
| Previous consideration | This is a standing item considered at each meeting of the Committee. |
| Next steps | <p>The next report to the Committee will be presented in June 2025.</p> <p>A full strategic risk register review will take place in 2025-26.</p> |
| Financial and resource implications | None as a result of this paper. |
| Associated strategic priority/priorities | <p>Continuously improve and innovate</p> <p>Build a resilient, healthy, capable and sustainable organisation</p> |

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|---------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
| Associated strategic risk(s) | All |
| Risk appetite | All |
| Communication and engagement | None as a result of this paper. |
| Equality, diversity and inclusion (EDI) impact and Welsh language standards | This paper includes the assurance of HCPC EDI as related to regulatory and business practices. |
| Other impact assessments | N/A |
| Reason for consideration in the private session of the meeting (if applicable) | Not applicable |

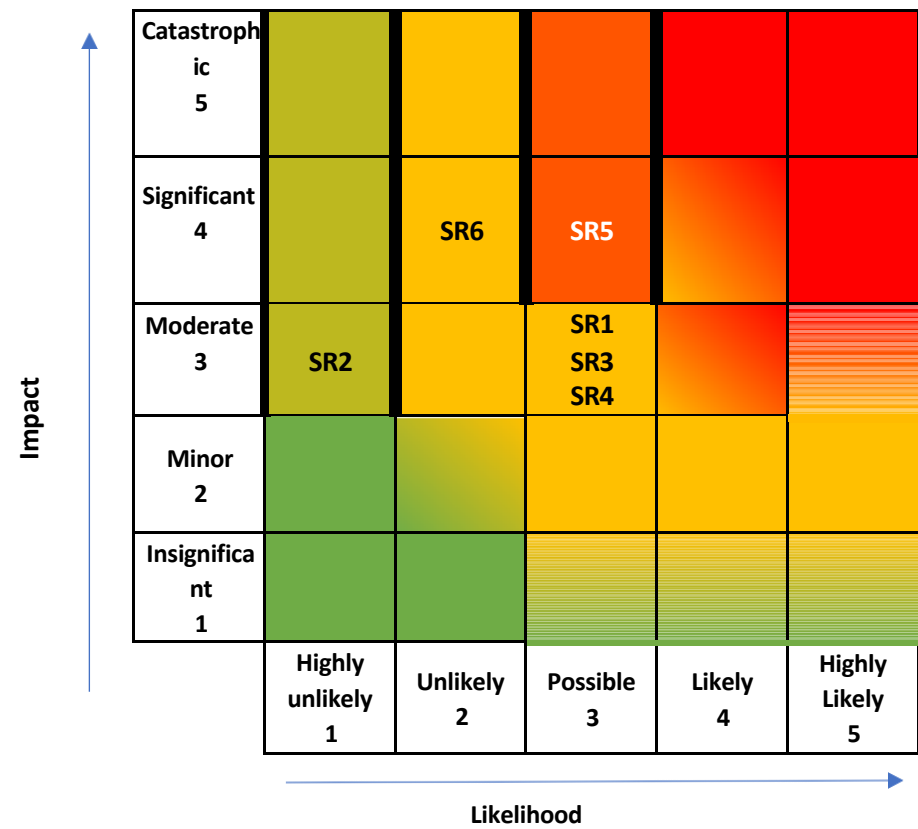
HCPC Strategic Risks

Summary of strategic risks

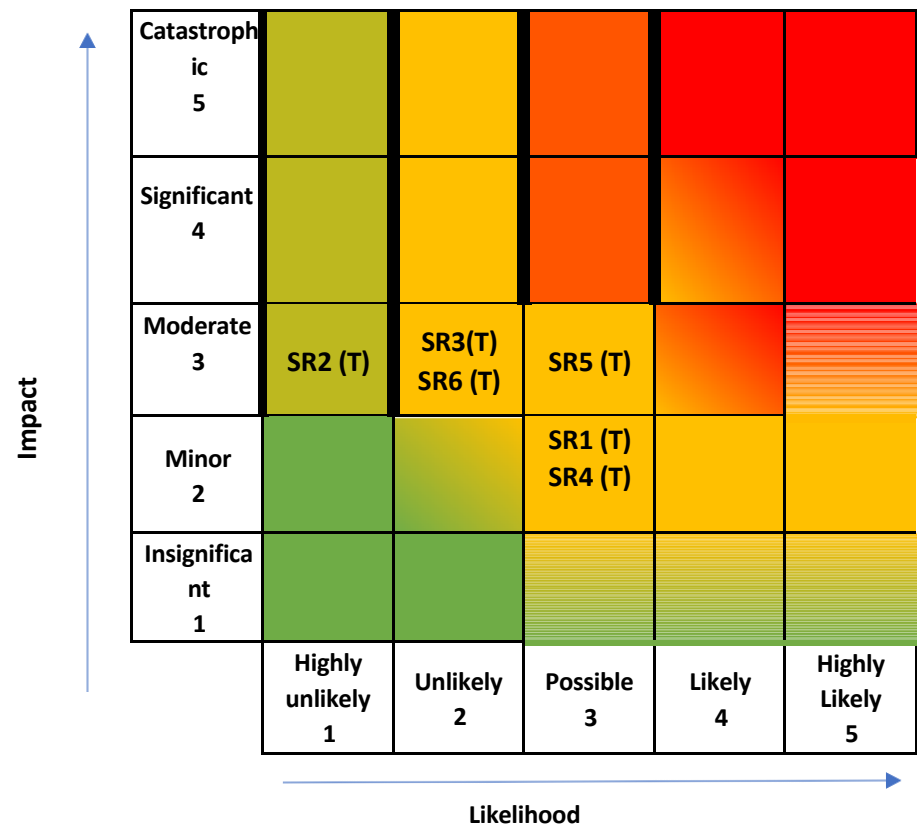
| Strategy | Strategic Risks - from November 2024 | Risk Description | Feb-25 | Target Risk* |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------------|
| 1 - Continuously improve and innovate - To improve our performance against PSA Standards of Good Regulation and to innovate across all our regulatory functions to provide an enhanced user experience. | 1. We are unable to deliver our regulatory requirements effectively in a changing landscape, affecting our ability to protect the public. | Not delivering or meeting: Informed registration decision making; Proportionate and fair fitness to practise (FTP) decision making; engaged education decision making; PSA Standards of Good Regulation; appropriately managed improvement programmes in regulatory areas; consideration of EDI needs, including accessibility of functions and fairness of decision making. | 9 | 6 |
| 2 - Promote high quality professional practice - Enable our professions to meet our standards so they are able to adapt to changes in health and care practice delivery, preventing harm to service users. | 2. Our standards do not reflect current practice and/or they are not understood by registrants and our stakeholders. | Relates to: Quality and suitability of our standards and guidance in setting a threshold for safe & effective practice which protects the public. How effectively we communicate our regulatory expectations. The effectiveness of our professionalism and upstream regulation work. Effective and informed consultation process, including enhanced EDI consideration. | 3 | 3 |
| 3 - Develop insight and exert influence - learning from data and research to inform our decision making and share insights to protect, promote and maintain the health, safety and well-being of the public. | 3.a Quality of our data leads to assumptions or gaps in understanding, and therefore inadequate or uninformed decision making. 3.b We are unable to maximise our use of the data we hold to share insights to protect, promote and maintain the health, safety and well-being of the public. | This includes our effectiveness in collecting, maintaining, and utilising the data we need to be an intelligence driven regulator and the effectiveness of our insight and intelligence work. It relies heavily on the work of the digital transformation and IT team and includes operational reporting in the Corporate Services team. It also relies on regulatory teams inputting information. | 9 | 6 |
| 4 - Be visible, engaged and informed - We regulate, take and communicate decisions which are informed by a deep understanding of the environment within which our registrants, employers and education providers operate. | 4. We are unable to effectively build trust, engage with and influence our stakeholders reducing our ability to understand their perspectives and regulate effectively. | This includes how effectively we engage with our stakeholders and our credibility with them and how well we play our part in the wider system. It includes our EDI practice externally, the ability to respond and influence external drivers for change. | 9 | 6 |
| 5 - Build a resilient, healthy, capable and sustainable organisation - Employees feel valued and supported, and fully able to contribute. The organisation is resilient and able to quickly adapt to changes in the external environment. | 5.a The resources we require to achieve our strategy are not in place or are not sustainable. 5.b Our organisational values are not reflected at all levels of the organisation, leading to staff not feeling supported/trusted/listened too. | This risk includes not securing the resources we need to be effective and / or not being efficient and effective in our use of our resources (resources include financial, knowledge, skills, culture, infrastructure). The development of our culture, people and physical assets, our continued financial viability and the significant failure of key business processes. | 12 | 9 |
| 6 - Promoting the value of regulation - The public, registrants, students and employers understand the value and importance of regulated health and care professionals. | 6. We do not sufficiently or appropriately promote our work leading to opportunities to enhance our regulatory activity being missed and the benefits of regulatory reform remaining unrealised. This can manifest in two primary ways: a) the role of regulation in the delivery of high-quality care is underestimated by the public, registrants, students and employers. b) our ability to protect the public is under-recognised by policy makers and influential stakeholders. | This risk includes the HCPC's capacity and capability to engage and influence regulatory reform effectively to ensure its benefits are realised, as well as the HCPC being viewed by government as a priority regulator for reform. | 8 | 6 |

| Old | Mitigation key | New |
|-----------------------------------------------------------------------------------|---------------------------|-----------------------------------------------------------------------------------|
|  | Preventative |  |
|  | Monitoring |  |
|  | Detective |  |
|  | Remedial |  |
|  | Horizon scanning |  |
|  | Best practice development |  |
|  | Communication |  |

Heat map of strategic risks - residual



Heat map of strategic risks - target



| Strategic Risk 1. We are unable to deliver our regulatory requirements effectively in a changing landscape, effecting our ability to protect the public. | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk Summary | <p>Not delivering or meeting:</p> <p>Informed registration decision making; Proportionate and fair FTP decision making; Engaged education decision making; PSA Standards of Good Regulation; appropriately managed improvement programmes in regulatory areas; consideration of EDI needs, including accessibility of functions and fairness of decision making.</p> |













| Date | Risk Owner | | | |
|---------------|----------------------------------------------------------------------|---|------------|------------|
| February 2025 | Executive Director of Education, Registration & Regulatory Standards | | | |
| | Executive Director of Fitness to Practice & Tribunal Services | | | |
| | Impact | | Likelihood | Risk Score |
| Inherent risk | 5 | x | 5 | 25 |
| Current Risk | 3 | x | 3 | 9 |
| Target risk | 2 | x | 3 | 6 |




Change

No

| Current Risk Influencers | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <ul style="list-style-type: none"> — The 2023-24 PSA performance report published August 2024 shows we met 16 of 18 standards. — Engaging with regulatory reform programme and are next on the list to go through the process. — Online applications project delivered online Int and UK applications. This has increased reg advisor processing productivity. — The Education team are focusing on case planning which will ensure greater compliance with KPIs and service levels — The second tranche of FTP improvement projects are in delivery, continued focus on embedding of tranche 1 benefits. + Continues high number of applications remains a challenge, with 2500 received in January alone. + Teams will require additional resource to engage in regulatory reform preparation when commences for HCPC. + Restrictions of the current legislation is that we’re not able to respond quickly to developments, constraining us in some areas. | |

| Risk Appetite |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Regulation = Measured; Influence and Leadership = Seeks</p> <p>The risk appetite target level within tolerance if below red/amber. We are confident that our standards and guidance are fit for purpose and so this risk is currently within risk appetite.</p> <p>To maintain that control onward reviews are essential to ensure standards are constantly kept under review to maintain relevance to changing practice and the wider health sector.</p> |
| Current risk level is within risk appetite |

| Mitigations in place | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <div>  Second line QA plan for 2024-25 to review success of improvements in FtP, Registration & education in addition to first line QA activity in place, such as the FtP DRG and panel member feedback following each hearing. </div> <div>  FtP improvement programme and governance in place, FtP improvement oversight board regularly meeting with attendance of PSA and DHSC. Regular self-assessment against PSA standards reported to Council. </div> <div>  Modern education QA model. 3 year programme to ensure providers are all in line has been successfully completed. </div> <div>  Centralised PSA coordination. Participation in inter-regulatory working groups to share good practice and discuss common issues, this is also provided though the use of a panel of legal providers for FtP matters with experience of </div> <div>  Plagiarism software introduced to provide further assurance on application documents and reduce the risk of fraudulent entry </div> <div>  Monitoring regulatory performance through performance reporting and KPIs. </div> | <div>  Mature feedback and complaints service in place focused on extracting learning when things go wrong. </div> <div>  Online application capability in place for UK and international applications. </div> <div>  Regular learning and development for Partners and employees. </div> <div>  Registrant health and wellbeing strategy, registrant support line in place. </div> <div>  Enhanced Record of Assessment introduced for applications from international graduates and CPD. This allows for further clarity to be provided on the assessments supporting more effective decision making. </div> <div>  Wide range guidance on HCPC’s regulatory processes available on our website. </div> |

| Areas of Development | Progress 2024-25 | Mitigation | Reporting period commentary |
|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Strengthen our user experience  | AI automation for contact centre has already seen improvements in quality and consistency of responses. An annual licence has been purchased and work will be starting to identify other mailboxes access the business, starting with policy. Initial investigation undertaken on opportunities to automate other parts of the registration process (Edu pass list verification, identity checks) | By delivering these workplans we will support the expectations of our stakeholders more effectively, ensuring a positive experience. | <p>The 2024-25 PSA performance review cycle ends 31 March 2025.</p> <p>The partner transformation work continues to progress and is on track to meet required deadlines.</p> <p>There has otherwise been little change since the last risk report.</p> <p>The risk score remains the same</p> |
| Partners transformation work  | Partner Payment Pathways design workshops and gap analysis undertaken with regulatory functions. Requirements for payroll identified and resource for deliver is being secured KPIs and quality assurance (QA) started in February 2025 | Updating our approach to our Partner stakeholder operating model. | |
| FtP improvements/developments  | FTP operating model on track for Q4, including frontloading. Scoping discussions commenced to inform review of sanctions policy. Review of operational processes for Hearings and Scheduling in progress, outputs may drive system changes. On track for Q4. | The new FTP operating model, including frontloading, will allow us to provide more timely decisions for the most serious cases. | |

Strategic risk 2. Our standards do not reflect current practice and/or they are not understood by registrants and our stakeholders.









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|--------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk Summary | Relates to: |
| | Quality and suitability of our standards and guidance in setting a threshold for safe and effective practice which protects the public; how effectively we communicate our regulatory expectations; the effectiveness of our professionalism and upstream regulation work; effective and informed consultation process, including enhanced EDI consideration. |



| Date | Risk Owner |
|---------------|----------------------------------------------------------------------|
| February 2025 | Executive Director of Education, Registration & Regulatory Standards |

| | Impact | | Likelihood | Risk Score | |
|---------------|--------|---|------------|------------|----|
| Inherent risk | 5 | x | 5 | 25 | No |
| Current Risk | 3 | x | 1 | 3 | |

| Current Risk Influencers | |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| — | Four country resource in place in for Professionalism and Upstream Regulation better enabling UK wide prevention engagement. |
| — | Education team now has a national/regional model with relationship managers in place for each provider. |
| — | Partnership working with NHS England on Preceptorship principles (supporting new professionals transition to workplace) approved by the Council and published. Implementation guidance published in November 2023. |
| — | Revised SCPEs and guidance on social media live Sept 2024. Easy read guide for standards of conduct, performance and ethics has been produced, aimed at the public. #mystandards 2024-25 events programme was delivered to raise awareness of standards requirements. |
| + | Changing expectations of our professions' practice as a result of pressures on services, tech or societal events. |
| + | Changes to SCPEs may pose risk to registrant understanding of expectations following implementation. Plan under active monitoring to mitigate. |

| Risk Appetite | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Regulation = Measured; Influence and Leadership = Seeks | |
| Current risk level has reduced from 6 to 3 and therefore is within risk appetite. | |
| To maintain that control onward reviews are essential to ensure standards are constantly kept under review to maintain relevance to changing practice and the wider health sector. | |
| Current risk level is within risk appetite | |







| Mitigations in place | | | |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
|  | Public consultation process in place, including equality impact assessments (EIAs) to capture the EDI element. |  | Policy enquiries function available to support understanding and application of our standards. |
|  | Engagement with key stakeholders/experts for widescale profession specific changes to standards, including the EDI forum. |  | Regulatory approach to advanced practice defined and agreed by the Council. |
|  | Guidance provided on meeting our standards, #mystandards webinar series available of YouTube. |  | Professionalism Liaison service in place influencing employers, using knowledge to effect change through engagement and advice. |
|  | Dedicated website hubs for registrants, students, employers, members of the public, education providers. |  | Policy and Communication teams at full complement. Head of Comms in place |




| Areas of Development | Progress 2024-25 | Mitigation | Reporting period commentary |
|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SETs review  | SETs review -Phase 1: Mobilisation and research (continuous Q1 '24/25 – Q4 '25/26) Continuing Phase 1 of the review, which complements each phase of the review with desk-based research and background reading activities. -Phase 2: Listening and gathering insights (completed Q4 '24/25) In February 2024, completed phase 2 of the review, which included stakeholder engagement with education providers, the education team and professional bodies. -Phase 3: Formulating proposals with our stakeholders (current phase Q1 '25-26) We are now in phase 3 of the review, formulating our proposals. The main aims of this phase are to identify areas of improvement or update to the SETs and draft those changes accordingly. | From phase 3 onwards, each phase of the review will be supported by the convening of expert panels on equality diversity and inclusion, artificial intelligence, simulation in learning and different models of learning. | The standards of education and training review continues to progress. New English language requirements introduced from 29 January 2025. There has otherwise been little change since the last risk report. |
| English Language  | New English language (EL) requirements in place from 29 January 2025. More information can be found here: New English language requirements for international applicants to come into effect in 2025 The HCPC | The new EL requirements will bring us inline with other regulators - broadly and appropriately consulted on | The risk remains the same. |

Strategic risk 3.a Quality of our data leads to assumptions or gaps in understanding, and therefore inadequate or uninformed decision making.
3.b We are unable to maximise our use of the data we hold to share insights to protect, promote and maintain the health, safety and well-being of the public.

Risk Summary
This includes our effectiveness in collecting, maintaining, and utilising the data we need to be an intelligence driven regulator and the effectiveness of our insight and intelligence work. It relies heavily on the work of the digital transformation and IT team and includes operational reporting in the Corporate Services team. It also relies on regulatory teams inputting information.

- Current Risk Influencers**
- Priority is to improve data quality before moving to next maturity level.
 - Findings of analysis of the attrition rates of the 15 professions published, contributing to wider workforce planning aims. Positive reception from stakeholders.
 - IT team delivered successful first modules of new data platform, supporting EDI reporting, meeting the needs of the Health Education England (HEE) data sharing project and improving access to core registration data.
 - % of registrant EDI data held has improved with 95% of those renewing opting to provide data. System improvements delivered to make data collection mandatory as part of online registration processes.
 - Data Engineer in place, data standards officer on secondment. A data migration specialist has been recruited on a temporary basis to support the Business Central project.
 - Automation of council reporting completed
 - + Ongoing risk of short term appointment of data manager, data consistency, accuracy and completeness will continue to be a concern.
 - + Quality and completeness of underlying data causing delays to analysis as significant cleansing work required. Insight and Analytics team working with Ops teams to resolve and mitigate against continued imputing of new bad quality data.

- Mitigations in place**
- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  Publication of FTP, education and registration information and datasets through annual reports and freedom of information (FOI) requests. |  Publication of in-house statistical analysis of EDI data and register attrition rates published. |
|  Insights and intelligence framework agreed, setting out priorities and approach for data analysis. |  Oversight board for Programme for Data Excellence in place. |
|  Dedicated resource for analysis and intelligence and data engineer in place. |  Renewals data dashboard accepted report now in place agreeing renewals counts of actuals and previous windows. |

| Areas of Development | Progress 2024-25 | Mitigation |
|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Research  | Weren't able to partner with original research partner due to their recourse. In the early stages of partnering with a new research partner - for artificial intelligence (AI) in 2025-26 work plan. Scoping is finalised on research to explore professional boundaries with a focus on sexual misconduct and will continue into next year. | Developing an organisational research strategy to utilise our data more effectively |
| Continuing to improve data quality/infrastructure  | Minimum data set for FTP in development, data manager in place to support this work and develop common data dictionary. Plans drawn up to continue the data platform build to implement this model, alongside undertaking design and build work for Registration data. Data manager will help to identify these. | Establishing MDS to support better use and consistency of data |
| Insights and Analytics  | FTP data supplementary analysis 2023-24 published in December 2024. Section 1 highlights the differences in rates of concerns reported to us across several areas including registration route, profession and protected characteristic. Section 2 relates to concerns at different decision points in the FTP process. First self-service tool published in Q3 for registrant diversity. Next one by end of Q4 for workforce profile. | Using the data available to us to understand our registrants, and share this data with our stakeholders |

Reporting period commentary

We are using our data more effectively and actively, including providing significant insight on our registrants.

As such the risk score has reduced.

| Date | Risk Owner |
|---------------|---------------------------------------------------------------------------------------------------------|
| February 2025 | Executive Director of Education, Registration & Regulatory Standards Executive Director of Resources |

| | Impact | | Likelihood | Risk Score | |
|---------------|--------|---|------------|------------|----------|
| Inherent risk | 5 | x | 4 | 20 | |
| Current Risk | 3 | x | 3 | 9 | |
| Target risk | 3 | x | 2 | 6 | Decrease |

Risk Appetite

Data = Open

Therefore, our appetite for this risk is to be within the amber scale rather than a higher appetite.

To reach our target we need to have the data platform in place to enable an analytics environment. We will require assurance on the quality of and approach to our data and reporting, including clear definitions.

Current risk level is outside risk appetite

Strategic risk 4. We are unable to effectively build trust, engage with and influence our stakeholders reducing our ability to understand their perspectives and regulate effectively.











Risk Summary This includes how effectively we engage with our stakeholders and our credibility with them and how well we play our part in the wider system. It includes our EDI practice externally, the ability to respond and influence external drivers for change.





| Current Risk Influencers | |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| — | Professional liaison consultants in place in each of the four UK countries, improving our reach for engagement work. |
| — | Collaboration with NHS employers to reach out to attendees of joining the UK workforce upstream events, contributing to the wider workforce agenda. Also, in this area we published our analysis of register retention improving understanding of attrition, preceptorship principles published and preparedness for practice research launched. |
| — | Education team now has a national/regional model with relationship managers in place for each provider |
| — | Strategic Relationship Lead in place and actively managing and supporting relationship managers' network. Relationship management model in place. Engagement management group established to support more targeted forward planning for engagement. |
| + | Single customer relationship management (CRM) system forms part of the tech roadmap agreed by the Council and we will be progressing an investment case for the early stages of this work as part of the 2025-26 investment round. |

| Date | Risk Owner |
|---------------|-----------------------------------------|
| February 2025 | Executive Director of Corporate Affairs |

| | Impact | | Likelihood | Risk Score | Change No |
|---------------|--------|---|------------|------------|--------------|
| Inherent risk | 5 | x | 5 | 25 | |
| Current Risk | 3 | x | 3 | 9 | |
| Target risk | 3 | x | 2 | 6 | |

| Risk Appetite |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Influence and Leadership = Seeks |
| We have built a strong engagement plan with our stakeholders, particularly building a more positive and transparent relationship with the Professional Bodies Forum. In order to meet target, this risk is also dependent on being able to deliver stakeholder expectations such as more automated processes. |
| Current risk level is within risk appetite |

| Mitigations in place | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  Executive Leadership Team (ELT) relationship building and liaison with key stakeholders particularly government departments, professional bodies, other regulators, unions. |  Policy statement on approach to MOUs in place, a number of MOUs agreed with key stakeholders. |
|  Personal engagement plans for Chair and Chief Executive in place. Engagement management group meets regularly to monitor and plan engagement strategically. Operational level relationship manager engagement for key stakeholders in |  Analysis and action planning from feedback mechanisms including corporate complaints, FtP stakeholder surveys, stakeholder opinion polling and education provider survey. |
|  Communications and strategic engagement supported by external communication partner. |  Professional body forum in place, including regular meetings both virtually and in person. |
|  Horizon scanning and intelligence gathering including from relationship building to be aware of external drivers and influencers, early planning, and scenario development. |  Office of Chair and Chief Executive established |
|  EDI strategy and action plan informed by independent audit of EDI practice. EDI stakeholder forum and internal EDI employee forum. |  Public consultation process in place, including equality impact assessments (EIAs) to capture the EDI element. |

| Areas of Development | Progress 2024-25 | Mitigation | Reporting period commentary |
|---------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HCPC Service User Strategy  | Contract with the Patients Association agreed for one year, will have core element of engagement strategy included. Longer term plan underway, currently defining responsibilities (continue next year) | Ensuring service user engagement in development of policy/strategy | We have continued to deliver a programme of active engagement with our stakeholders and also continue to strive to improve our engagement and impact. On 12 February 2025 the new online concerns form went live, delivering an improved user experience and insight on who our processes impact. The risk remains the same. |
| Equality, Diversity and Inclusion  | EDI on FTP complainants is being collected now, live from February 2025. Influencing research: one of the UK-REACH I-CARE stakeholder of this group and influencing this research Fitness to Practise Data Supplementary Analysis 2023-24 published in December 2024. Section 1 highlights the differences in rates of concerns reported to us across several areas FTP process. | Gathering further EDI information in order to identify any bias or unintended consequences in our decision making process. | |
| Stakeholder engagement  | Internal key lines doc being reviewed for consistency and accessibility Stakeholder survey went out and we have received positive responses - focused on availability and access people have with the HCPC. This has been discussed with the Executive Leadership Team and will inform the 2025-26 workplan. | Active engagement by CEO and Chair with stakeholders. Measuring the impact of our engagement will support continuous improvement. | |
| Council Apprentice  | Apprentice alumni network first met in February 2025, such a positive experience that will meet three times a year instead of twice. Two new apprentices started at the beginning of the year and will continue to provide a positive impact on Council. Continuing to work with the General Medical Council (GMC) on our experience of these, as well as learning from other similar schemes. | Ensuring more diverse voices on council informing decisions. | |











| | |
|-------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Strategic risk 5.a The resources we require to achieve our strategy are not in place or are not sustainable. | |
| 5.b Our organisational values are not reflected at all levels of the organisation, leading to staff not feeling supported/trusted/listened too. | |
| Risk Summary | <p>This risk includes not securing the resources we need to be effective and/or not being efficient and effective in our use of our resources (resources include financial, knowledge, skills, culture, infrastructure).</p> <p>The development of our culture, people and physical assets, our continued financial viability and the significant failure of key business processes.</p> |







| Current Risk Influencers | |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| — | Budget factors in projected future benefits of investments, to be validated at project initial phase and tracked to ensure deliver. |
| — | 23-24 balanced budget achieved. Draft 24-25 balanced budget, medium term financial plan. |
| — | November 2023 fee rise implemented. Regular, incremental fee reviews required to maintain HCPC financial sustainability, including in light of increased costs from FTP volumes, need for continued investment and financial risks. |
| — | People strategy in place: BDO audit shows good progress. Performance against KPIs good - sickness absence and turnover reducing. APDR participation for 23-24 was 100%. New programme for aspiring managers launched in October 2024. |
| — | Business Central finance system live from April 2024, improving financial control and reporting. Phase 2 in progress. |
| — | Carbon baseline for the HCPC now established with action plan for improving sustainability being developed with expert input and involvement of ELT and the Senior Leadership Team. |
| — | Publication of gender and ethnicity pay gap reports. |
| — | Change and Benefits Forum established, reporting to ELT to strengthen change management and ensure delivery of benefits. |
| — | Restructure of ELT live from 1 Nov 2023, with maternity cover appropriately planned to mitigate gap. |
| + | Legal position on partners' employment status determined, following judgement in Nursing and Midwifery Council (NMC) employment tribunal case. Project initiated to manage the different streams of work including contracts, payments, and quality statements. |
| + | Rising inflation increases HCPC costs and HCPC employees cost of living pressures; impacts mitigated by budgeting, pay review and efficiency plans as part of benefits realisation. |

| Date | Risk Owner | | | |
|---------------|---------------------------------|---|------------|------------|
| Feb 2025 | Executive Director of Resources | | | |
| | Impact | | Likelihood | Risk Score |
| Inherent risk | 5 | x | 5 | 25 |
| Current Risk | 4 | x | 3 | 12 |
| Target risk | 3 | x | 3 | 9 |

Change
No

| Risk Appetite | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Financial = Measured; People = Open | |
| <p>Current risk is outside risk appetite, with the benefits of the introduction of increased fees in November 2023 and a positive People Strategy internal audit report partially offset by continued financial pressures and long term risks. To meet our target risk we need regular fee reviews to maintain financial sustainability, in addition to maintaining the rate of progress in other areas. The target also requires our financial reserves to be stronger.</p> | |
| Current risk level is outside risk appetite | |







| Mitigations in place | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  Adherence to budgeting and financial management and reporting processes which are subject to internal and external audit e.g. NAO. Finance business partner challenge and budget setting principles agreed by ELT to challenge the business |  Adherence to HR processes in relation to recruitment, annual performance development review and learning and development for employees. All HR policies have been updated in the last 12 months. |
|  Business change function provides challenge on benefits outcomes of investment in new areas of work or enhancements to existing processes. Medium-term financial strategy in place incorporating an efficiency action plan. |  Adherence to partner processes in relation to recruitment, onboarding and partner code of conduct (updated January 2024). |
|  All employees are set goals and objectives and undertake annual performance review which includes an assessment against our values (Fair, Compassionate, Inclusive, Enterprising) promoted through all employee performance system |  Effective IT system design maintaining confidentiality, integrity and availability of data. Digital transformation strategy provides roadmap for improving our IT systems. |
|  and HR includes a central learning and development function for employees, which runs an annual learning and development plan for commonly identified skill and knowledge needs in addition to annual compliance training. |  Maintenance of ISO27001 Information Security standard which is subject to external audit/regular independent security assessments of key IT infrastructure. Maintenance of business continuity infrastructure. |
|  Employee Forum acts as a consultation group for organisational change. |  ELT monthly monitoring of productivity of all departments through detailed performance reporting. KPIs reported to Committees and Council for oversight of performance and progress in meeting agreed milestones. |





| Areas of Development | Progress 2024-25 | Mitigation | Reporting period commentary |
|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Update HCPC Fee model  | Framework for regular fee reviews complete with Council approval. Council agreed to proposal to increase annual registration fees in line with the outcome of the consultation with stakeholders. Progressed the legislative approval process. | A new fee model allows is needed in order be sustainable and achieve our strategy | Positive improvement has been seen in the engagement of staff with the pulse survey. |
| People strategy  | The Pulse survey has continued to see improved engagement: Q1 70%; Q2 80%; Q3 83% Two Speak Up Guardians in post, they have completed training and are in the process of meeting every team across the organisation to introduce themselves and the role. Will present at every corporate induction. The next set of management training and senior leadership training is underway, and the current aspiring to manage mentorship programme is nearing the end. | The people strategy is in place to improve retention, recruitment, and culture | Two Speak Up Guardians, Claire Baker, Head of Adjudication Performance, and Anna Raftery, Head of Assurance and Compliance, have been appointed to provide additional support to employees who wish to raise concerns. |
| Digital transformation  | Modern data platform revised project plan agreed with ELT. Requirements for new telephony system is underway. Plans being put forward in investment planning process to take forward Digital strategy technology roadmap. | Modernising our data platform and approach is needed to ensure we are sustainable and effective | The risk remains the same. |
| IT security modernisation  | Work continuing roll out of E5 with investment case being developed for next phase. On track for Q4. Initial discovery work has started on AIP and DLP solution. | Modernising our IT security is needed to ensure sustainability | |
| Environmental Sustainability  | New health and safety and environmental sustainability compliance software to be introduced to support live intelligence and proactive engagement. Employee Forum supported delivery of an environmental sustainability workshop Aircon and boiler replacement feasibility study completed. | As a modern an conscientious organisation our environmental sustainability plan ensures we are in line with requirements. | |
| Business Central Phase 2  | Invoice automation work on track as planned. Deferred income module pushed back to Q3-4, owing to capacity constraints. Approach now defined. Move to Q1 next year flagged. Contract management module pushed back to Q4, on track for Q4. KPI and dashboard reporting on track per plan – Q3/Q4. | Delivery of phase two of business central is required to complete the modernisation of our financial systems | |

Strategic risk 6. We do not sufficiently or appropriately promote our work leading to opportunities to enhance our regulatory activity being missed and the benefits of regulatory reform remaining unrealised. This can manifest in two primary ways:
a) the role of regulation in the delivery of high-quality care is underestimated by the public, registrants, students and employers.
b) our ability to protect the public is under-recognised by policy makers and influential stakeholders.

Risk Summary
This risk includes the HCPC’s capacity and capability to engage and influence regulatory reform effectively to ensure its benefits are realised, as well as the HCPC being viewed by government as a priority regulator for reform.

- Current Risk Influencers**
- In its response to its consultation on regulatory reform, the Department of Health and Social Care (DHSC) has confirmed that the HCPC and NMC will be the priority regulators for reform following the GMC.
 - The HCPC provided feedback on, and participated in cross regulatory round table discussions, regarding the development of the GMC Section 60 order. The HCPC has responded to this consultation.
 - Government leadership changes and challenges in the health landscape could impact on the progression of regulatory reform due to other priorities.
 - Collaboration with stakeholders such as NHS England provides organisational experience for greater cross organisational collaboration on workforce as aimed for in regulatory reform. Positive and wide-reaching engagement with HCPC stakeholders on regulatory reform.
 - The HCPC has engaged with DHSC on how the recommendations of KPMG on the future regulatory landscape may be taken forward. DHSC have indicated that this will not be progressed as a priority, with the S.60 taking priority.
 - + Funding needed to progress regulatory reform internally not included in 2023-24 budget and will be funded by ringfencing any surplus in 2022-23 and contingency in 2023-24 budget.
 - + HCPC funding challenges risk being unable to scale up to meet needs of regulatory reform due to parliamentary approval of fees and associated long process to achieve this.
 - + Regulatory reform not included in 2024-25 budget but will be reviewed once firmer dates are confirmed.
 - + While HCPC has now been named as the next regulator to undergo reform there is not clarity at this stage on the timescales for this. We expect this clarity once DHSC has run its consultation on the GMC legislation. Lack of timescale challenges planning and scaling up of resources within HCPC dedicated to reform. Change of government may have an effect.

| Mitigations in place | | | |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | Communications and strategic engagement including parliamentarians and cross-party engagement on regulatory reform supported by Luther Pendragon. |  | Participation in cross regulator analysis of draft legislation and other regulatory themes, the HCPC’s comments on draft legislation have been provided. |
|  | HCPC engagement on Health and Social Care Bill led to positive change. |  | Funding and resource required for progression of regulatory reform quantified within budget as a financial risk. Assessment of de-prioritisation of other development work undertaken to create capacity for regulatory HCPC medium term financial plan in place to seek to make provision for regulatory reform. Consultation expected to launch September 22. |
|  | Some dedicated policy resource in place. |  | |

| Areas of Development | Progress 2024-25 | Mitigation | Reporting period commentary |
|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Increase engagements with and influence of employers  | Professional Liaisons delivered three "Employer Insights" webinars, including on challenging sexual misconduct. Team using key date to target where to deliver content, while still being agile for invites to events run by others. | Increased engagements with wider stakeholders ensure understanding the value of our work, encouraging support for reg reform changes | In frequent conversation with DHSC on GMC changes - currently feeding back on governance framework DHSC has an indicative timescale |
| New registrants to UK practice  | Forward schedule of workshops planned to promote our preceptorship principles. Launch of new email (Sept) for registrants (September) (UK & International) to support registrants joining/returning the workforce (email now been launched) Workshop with employers on preceptorship held (September 2024). | Supporting registrants new to UK practice supports addressing the workforce crisis | The Professionalism and Upstream Regulation department continues to deliver a quality timetable of workshops to address the pressures facing our registrants. |
| Increase engagement with learners  | The HCPC student competition has its highest number of entries this year, with a high level of quality noted by the judging panel. This year, students were invited to create a learning session exploring the risks and benefits of using social media in your practice as a health and care professional. The winners were formally awarded their prizes by the Council on 5 December 2024. | As above | The risk remains the same. |
| Communication strategy  | Comms campaign for new standards completed with follow on comms to continue throughout the roll out phase to support with bringing new standards to life. Roll out of standard, rolling campaign continuing through Q3 and Q4. Launch has happened, ongoing campaign continues. Launch of new email in September 2024 for UK and International registrants to support registrants joining/returning the workforce. | As above | |

| Date | Risk Owner |
|---------------|----------------------------------------------------------------------|
| February 2025 | Executive Director of Education, Registration & Regulatory Standards |
| | Executive Director of Corporate Affairs |

| | Impact | | Likelihood | Risk Score | ← Change No |
|---------------|--------|---|------------|------------|-------------------|
| Inherent risk | 4 | x | 5 | 20 | |
| Current Risk | 4 | x | 2 | 8 | |
| Target risk | 3 | x | 2 | 6 | |

Risk Appetite

Reform = Open

Current risk is within appetite.

The target risk will be reached if the outcome of regulatory reform and the longer-term regulatory landscape review compliments and endorses the multi profession regulation model. This requires successful HCPC engagement and effective messaging. Risk reduction also required greater clarity on timing of HCPC’s reform and confidence that funding and resources in place realise the opportunity of reform.

Current risk level is within risk appetite