Audit and Risk Assurance Committee 10 March 2021

hcpc | health & care professions council

Internal Audit report – HCPC Intelligence Gathering

Executive Summary

As part of the 2020-21 Internal Audit Plan as approved by the Committee, BDO LLP have undertaken a review of the HCPC's intelligence gathering.

The review focuses on the end-to-end activities relating to the gathering of data, whether as part of normal regulatory activity or proactively and considers the means by which HCPC converts data into meaningful intelligence.

The review does not test in detail the efficacy of current data and intelligence gathering, analysis and dissemination processes but does examine the design of the current processes alongside evaluating the intended design of new and future developments.

Previous consideration	None.
Decision	The Committee is invited to discuss the report.
Next steps	Recommended actions agreed with the Executive will be tracked for progress in the Committee's standing recommendation tracker report.
Strategic priority	All
Risk	All
Financial and resource implications	The cost of the audit is included in the Internal Audit annual fee.
Author	BDO LLP

HEALTH & CARE PROFESSIONS COUNCIL (HCPC)

INTERNAL AUDIT REPORT - FINAL

INTELLIGENCE GATHERING
MARCH 2021

BDO

Contents

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Reviewed by:	Bill Mitchell

1   Executive Summary

Introduction

1.1   As part of the Heath & Care Professions Council internal audit plan for 2020/21, as approved by the Audit & Risk Assurance Committee, we are undertaking an audit of Intelligence Gathering.

1.2   Using data to provide intelligence on either 1) individual registrants, cohorts/groups of registrants and, 2) more general insights about the professions to inform regulatory decisions, is a critical component of good regulation. A regulator that does not manage to 'join the dots' with the data it holds, particularly the data it collects as a matter of routine, and thus does not see major regulatory risks emerging, would be reasonably regarded as failing in its core responsibilities. Likewise, regulators that do not talk to and share intelligence with their counterpart regulators within the system in which they operate, creates a risk to both the regulator in question and erodes public confidence in the sector's regulation generally. Thus, intelligence gathering is an inherently important risk management strategy that HCPC should be managing.

1.3   Intelligence gathering ensures a regulator understands the characteristics of its stakeholders, in particular its registrants, explores and addresses any disproportionate impacts of its regulatory processes, and shares information with others where appropriate, such as systems regulators, to reduce patient safety risks. Intelligence gathering helps a regulator spot trends early and respond to them before they become more widespread or more significant over time. 'Upstream' regulation can, in theory, reduce cost but increase regulatory effectiveness.

1.4   HCPC is on a journey to improve its capability to collect and analyse data, draw insight and intelligence and respond accordingly. Many positive actions and initiatives are underway and some are already operating. These include:

- Improving its outreach.
- Better data collection.
- Developing better systems to collect and pool data.
- Use of enquiry and complaint data to inform policy, as well as pursuing complaints about individual registrants.
- Improved stakeholder consultation.
- Management and issue identification.
- Media scanning.
- Perceptions & opinion polling
- Research work
- Increasing the data fields collected as a routine, etc.

1.5   An Insight and Intelligence function has also just started operation which is intended to bring the intelligence work together and assist with making improvements.

1.6   The response to intelligence can range from early FtP actions on individual registrants, changes to internal or regulatory policies or procedures, targeted actions on groups of registrants, targeted CPD, for example. This audit was completed in accordance with the approved annual Internal Audit plan for 2020/21.

1.7   Our focus was on the end-to-end activities relating to the gathering of data, whether as part of normal regulatory activity or proactively. We considered the means by which HCPC converts data into meaningful intelligence. Both intelligence on individual registrants, cohorts of registrants and wider learnings for individual professions, healthcare professions in general and HCPC were included. Intelligence sharing between the healthcare profession regulators and systems regulators and law enforcement was considered.

The scanning of traditional and social media will also be included. Research, polling and opinion sources were included.

1.8   The review did not test in detail the efficacy of current data and intelligence gathering, analysis and dissemination processes. It examined the design of the current processes alongside evaluating the intended design of new and future developments. The key risks with this area of activity are whether:

- Governance and oversight of intelligence gathering is clear.
- Data collection, assimilation, analysis and storage provides sufficient depth and breadth of coverage, exploiting the range of data sources available internally and externally.
- Methods and systems for drawing intelligence from data, both planned and in place, are appropriate, properly validated and proportionate.
- Reporting mechanisms for the intelligence provide the information to the right people at the right time.
- Translation of intelligence is made into the right regulatory responses.

Key conclusions

As this is primarily an advisory review, we have not given a formal assurance rating for this report. However, our work has identified a number of key positive findings and a number of important considerations that we believe HCPC will benefit from taking on board.

Positive findings

1.9   The HCPC's intended framework for the intelligence-led regulatory end-to-end 'process' mirrors good practice and other similar organisations' approaches:

- Identifying sources of data, information, intelligence and insight
- Import the data in a readily analysable form into a system
- Hold all data in a data platform or warehouse
- Conduct analysis and drawing patterns and insight
- Prioritise findings and report them internally to the right people at the right time and frequency
- Take action using an array of regulatory tools – referrals for individual FtP cases, policy, changes to CPD, education etc.
- Feedback & review to check impact.

1.10   The new data platform provides a strong basis for the future and will be integral to the long term aims of HCPC to be an intelligence-led regulator. The principles of its architecture, including the drawing in of data from both established operational systems such as registration, FtP and education, together with other data sources such as from stakeholder engagement and outreach work, media, social media, etc., are the correct ones.

Areas for further development

1.11   However, our review has highlighted a number of key areas that need to be developed. To maximise the benefits of gathering data and for intelligence-led regulation to properly take off, the work needs go beyond the building of systems. We consider, and HCPC recognise, that the gaps to fill relate to the underlying and feeder 'systems', methods, approaches and culture that need to be developed alongside the digital technology and strategic aims. We consider there are many strands still to flesh out, design and implement before HCPC will meet their ambition of being an 'upstream' regulator:

- **Governance of the end-to-end process** - There needs to be much clearer ownership and lines of authority over the end-to-end intelligence process, the data and its accuracy, the systems supporting the processes

and information governance. In our experience, without clear responsibilities, the effectiveness of insights and intelligence work will be impeded significantly. Many parties in HCPC will be inevitably involved, so it will be harder to coordinate. Thus, the new Executive Director for Professional Practice and Insights role is key, but that person will need to have proper oversight and authority of the whole end-to-end process. If set up right, that person can provide the necessary governance and to ensure the end-to-end process delivers successfully, efficiently and coherently.

- **Governance of data and priority of effort** - There also needs to be clarity about who owns the decisions about priorities for seeking, analysing, prioritising and reacting to intelligence. Clarity is required on the authority for the prioritisation of the raw data required, the intelligence being sought, its reporting and HCPC's regulatory responses to that intelligence. These activities will have to involve a broad group of senior personnel. A Council representative for data and intelligence could provide expertise and act as a critical friend. Moreover, information governance needs to continue to be embedded in everything that is designed, built and used.

- **Include all data types** – HCPC needs to ensure there is sufficient data capture - soft and unstructured data as well as hard and structured data. Care needs to be taken to not overburden the registrant with data requirements and not stray from data required for clear statutory reasons.

- **Stakeholder & outreach engagement data capture** - There needs to be an primary customer relationship management (CRM) IT system for capturing soft and hard data on outreach, social media, stakeholder engagement and other interactions, whether the interactions' primary purpose is for intelligence gathering or other reasons such as stakeholder engagement or press relations. Such a CRM is needed for good management of stakeholder and other engagement and provide the route in by which intelligence can enter the data platform.

- **Mechanisms for assimilation, drawing conclusions & taking actions** - Careful thought needs to be considered now on the mechanisms to assimilate and draw conclusions from the data is going to work. In a similar way to governance and ownership of data and the role of the intelligence and insights system, there needs to be clear authority and governance on the information sharing, reporting and the coordination and tracking of regulatory responses to insights and intelligence:

    — A forum for the initial assessment of intelligence
    — Escalation protocols for the escalation of intelligence to more a more senior level
    — A senior cross-HCPC group is for prioritising actions and making decisions on the best regulatory interventions and have the authority to instruct others in HCPC to build the intervention required.
    — A mechanism to track delivery of the intervention and measure its success.

- **Rooting intelligence-gathering priorities in strategic priorities and risks** - The data platform will open up almost limitless opportunities' for drawing insight and intelligence from data. While it is fine to take the approach of 'build it and they'll come' when construction such a tool, because the possibilities are numerous, it is helpful to take a risk based approach and target the questions wanting answering that meet HCPC's most significant inherent regulatory risks. We consider that a clear series of structured questions is required. This can take the form of giving the intelligence process some short, medium and longer term goals, combined with testing pertinent hypothesis about the registrant communities – (answering questions such as "is there high association between being self-employed practitioner and being more likely to harm patients").

- **Cultural and behavioural change** - Finally, to switch genuinely to an intelligence regulator needs to have the commensurate culture, behavioural habits and direct everything it does to that goal. The building of a data platform is only the start. HCPC probably recognise this, but a lot more needs to be done to embed this radically new approach.

Recommendations summary table

1.12   The following table summarises the recommendations made across the key risks audited, grouped by priority ratings:

Key risk area		Recommendation Priority rating		
		1	2	3
1	Strategy and governance	3	1	-
2	Data gathering and assimilation – range of coverage	2	3	-
3	Storage and analysis	2	-	-
4	Reporting and Delivering Regulatory Responses to Intelligence	2	-	-
	Total recommendations made	**9**	**4**	**-**

1.13   The following tables in Section 2 Key Findings show the results of our analysis by each key risk area. Areas for improvement are highlighted with the key recommendations in the right-hand columns.

2   Key Findings

Key Risk Area 1: Strategy and Governance

Background
Intelligence gathering should not be viewed as a function of specific departments within an organisation but rather as a holistic function. 'Buy-in' from Senior Management is essential as is a clear vision. The strategic direction of an organisation with respect to intelligence gathering should be outlined in an overarching strategy.

1.1 Strategic direction and organisational design

Findings & implication	Recommendation
Positive findings • HCPC is on a journey to improve its capability to collect and analyse data, draw insight and intelligence and respond accordingly. A data strategy has been produced and is linked to the intention of introducing a data platform that is better able to capture and assimilate data for the purposes of capturing insights and intelligence and thus improve its regulatory capabilities. • HCPC are keen to move to a predictive and preventive regulator. This a common stance amongst regulators in healthcare professions and beyond. The steps taken so far, and the future plans in outline, are broadly consistent with colleagues in similar organisations. • Current data collected for standard, established, transactional processes such as registration, fitness to practise and continued practice (CPD) have clear ownership and responsibilities. This helps to ensure responsibility over data accuracy is clear and provides a strong platform for data to form a more significant role in providing intelligence and insight. • We found that there is a general awareness that good data governance is required for the development and operation of an intelligence 'process' (data collection through to reporting and acting on intelligence and insight). • There is awareness that there needs to be some organisational redesign work, to ensure the oversight and ownership of data governance is fit for purpose. There are multiple owners of multiple datasets currently across HCPC. • The structure of the organisation and how data, digital and IT is overseen at SMT level is changing. Such a change will be one important component of ensuring suitable oversight and governance over the intelligence gathering, assimilation, reporting and response activities.	1. Ownership for individual datasets and the precise roles and responsibilities for the insights and intelligence staff and front line staff needs to be made clear. This includes the responsibility for the accuracy of data 2. There needs to be clear ownership of the insight and intelligence end-to-end process, including at SMT level (with the new executive director role having clear authority) and a Council lead. *Priority 1*

Management response
Accept   **Action:**   1) Individual dataset ownership and related roles & responsibilities will be defined as part of the creation of a data governance framework.   2) The new Executive Director for Professional Practice and Insight will take ownership of insight and intelligence when they take up the role. In the meantime, the Insight & Intelligence Manager is developing a framework which will be presented to SMT and Council.

Findings & implication	Recommendation
Areas for improvement and implication • Data is held currently in 'siloes' and its creation and analysis into intelligence tends to be localised. It is not clear on the responsibility and accountability for data once it goes into the live data platform (lake), including responsibility over data accuracy and ensuring any data modification or assumptions built into data are clear and mutually agreed and understood. • Linked to silo working is the cultural aspects of taking responsibility for data - the propensity for being open to share it. Given our experience in other regulators, it is likely that there will be some resistance to sharing data and challenge over the ownership of data going forward. This particularly applies where activities shift from local frontline teams such as registration and FtP to an insights and intelligence team. • HCPC needs to consider who "owns" and oversees the intelligence process end-to-end. There are and will be several parties involved in the end-to-end process. A single SMT member or committee oversight and authority is required to provide a coherent authority and oversight over the end-to-end process. For example, deciding and agreeing on priority areas for seeking deeper insight and the priorities for data collection to support that insight. A new executive director is being appointed for insights and intelligence and should fulfil this role, with the right authority to own and drive the end-to-end process. HCPC would also be beneficial if Council has a representative for data and intelligence – to provide the necessary expertise to act as a critical friend.	**Action 1** ED Corporate Services **Action 2** Insight & Intelligence Manager / ED Professional Practice & Insight **Completion date:** Q2/Q3

1.2 Data strategy – data platform approach

Findings & implication	Recommendation
Positive findings • The data platform project approval and proof of concept approval mechanism provides demonstrates that organisation has been sighted and is in agreement with the strategic principles of the programme. • Building a data platform is the correct approach given the systems in place and the need to ensure day-to-day use of registration, fitness to practise and other core systems are kept independent. Interrogating live systems could slow them down or compromise the data. Putting multiple datasets onto one platform for analysis and intelligence 'mining' will also maximise the probability of detecting intelligence. • An IT Strategy paper encapsulates the development of the data platform. The strategy was approved by SMT and Council. The IT strategy and the proposed data platform provide the means to pool data collected in different and disparate departments into one common system. One of the problems with the current arrangements, as experienced in many regulators, is that the individual teams' collection and retain data for themselves, that will likely to be useful for other departments. Such a coherent strategic approach to data reduces also the risk of duplication of data collection. • The new insights function is currently researching on what HCPC has in terms of data with a view to developing an insights and intelligence framework, which links back to HCPC's new strategic framework and corporate priorities. It is important that the intelligence and insights work is anchored in an organisation's strategic framework in order for it to be relevant. • The new insights team is also considering the governance on how to share and use information within HCPC and share and use information from external sources. Good use of external data is standard practice. **Areas for improvement and implication** • There are virtually endless possibilities as to what can be learned from interrogating an intelligence model or platform. Thus, there needs to be clarity on the questions that the process needs to be asked/answers sought and the key, strategic priorities for HCPC's analysis work. We suggest that HCPC start by prioritising intelligence gathering and analysis relating to core business objectives and risks, ensuring quick-wins and demonstrable improvements to regulation. • Given that HCPC has invested in new FtP and registration systems, it is important that the data analysis tools built in to these systems are utilised and not replicated in the intelligence and insights work. As the systems are new, they will have many more capabilities for data analysis than their predecessors. HCPC are conscious of this point, but it needs to kept in view.	3. The use of the data for intelligence purposes should be structured and agreed. They should be targeted to answer 'questions' that are most pertinent to HCPC's strategic aims and most significant risks and issues. *Priority 1* 4. Decisions need to be made formally on what data analysis work is done using the front line systems such as registration & FtP and that drawn from the new data platform. Some data may be available 'self-service' and other will need analysis work. *Priority 2* **Management response** **Accept** **Action:** The delivery approach for the data platform and subsequent reporting and analytics needs will be driven by needs that align to HCPC strategic aims including those of the Insight and Intelligence Team, how HCPC control this will be defined as part of the project and ongoing data governance frameworks. (3) The initial priorities for the insight & intelligence function have been identified and are based on risk. These include analysis of EDI, FtP and CPD, all of which align to the strategic aims in the new Corporate Strategy (4) **Action Owner:** Insights & Intelligence Manager and ED Corporate Services **Completion date:** End of Q4 2021

Key Risk Area 2: Data gathering and assimilation – range of coverage

Background
Organisations should have a clear vision of how they intend to gather data. This vision should focus on the nature of data collected (e.g. structured vs. unstructured) and how this relates to its insights capabilities. Ownership and governance of policy and the execution of relationships with other bodies is important to ensure that the relationship and the output from that relationship is effective and the interaction is authorised, meets the intentions of senior management and is appropriate.

2.1 Approach to data gathering

Findings & implication	Recommendation
Positive findings	5. Part of the consideration about what questions to ask of the intelligence system and what it should be focussed on, need also to consider the cost of compliance, in terms of the cost and inconvenience to the registrants in requiring more data fields. Registrants are likely to question the added value of further data requests. HCPC will be subject to GDPR if they require data outside of their 'statutory' responsibilities too.
• It is preferable to have structured data where the data is fairly definitive in its nature. For example, on advance practice or specialisms are recorded currently in a free text form and not structured such as selected from a drop down list of advance practice types. Thus, there appears to be an overall aim at HCPC to encourage the use of structured data wherever reasonable and possible. A good proportion of structured data in a dataset allows for more insight on matters relating to individual registrant cases and enables good, reliable data queries, where factual data is required. Free text, unstructured data can provide greater context and insight, but is usually harder to 'mine'.	
	Priority 2
• Changes in the HCPC's approach to its regulated communities and stakeholders – 'tone of voice' and a new empathetic approach to stakeholder engagement - should help to encourage a more open dialogue with HCPC and thus the likelihood of stakeholders to be willing to share intelligence. We consider that positioning the HCPC as an organisation that their stakeholders want to support is an important part of making intelligence led regulation effective.	6. Both opportunities to capture both hard and soft data must be incorporated into the intelligence and insights model and a key consideration in the design of all systems used to capture, store and analyse data and draw insights and intelligence from that.
	Priority 1
• Research projects have been undertaken on specific topic areas. We would encourage that research topics present a way to delve into specific topic areas – perhaps suspected hypothesis about areas of risk. In our experience, this starts to exercise people's thinking about the risks and potential insights in general, as well as researching and finding answers to specific issues or perceived views about where the risks are.	**Management response**
	Accept
Areas for improvement and implication	**Action:** Will be addressed as part of the project and ongoing data governance frameworks
• Care needs to be taken to avoid asking registrants for significantly more information about themselves as part of their normal interactions with HCPC. Increasing the number of data fields required of registrants might enrich HCPC's data platform but could easily degrade the relationship with the registrant, unless the information is clearly and demonstrably justifiable. Information requirements need to be thought about carefully and established in a coordinated way, with a clear business case and clear benefits realisation.	**Action Owner:** ED Corporate Services
	Completion date: Q2/Q3 2021

Findings & implication	Recommendation
• Emphasis is being placed on 'hard' data, but it is 'soft' data which gives the fully rounded picture about the area, group or person subject to regulation. Capture for this is not routine and mechanisms needs to set up to do record this data.	

2.2 Data sets captured

Findings & implication	Recommendation
Positive findings • Core 'transactional' data used for the day-to-day delivery of registration, FtP and education provides a rich and reliable starting point for data collection. • Over and above the standard routine data from registration, fitness to practise and education, HCPC has a range of intelligence sources that it uses to inform its regulatory activities, including social media; stakeholder engagement; and, oversight of, visits to and reporting by the education providers. Some of these activities are captured in formal databases or electronic records such as spreadsheets. • An outreach team has been started, designed to engage more regularly with stakeholders, with the aim to enable identification of early warnings and trends on potential regulatory issues emerging – about individuals or groups of individuals (although HCPC recognises that this work needs further development). • Finance are able to track defaults on registration so it is possible to use this data as an indicator of general compliance. • Partners and panel members are stakeholders that have been identified as potential sources of intelligence and insight. **Areas for improvement & implication** • There is a known lack of formal data capture and retention mechanisms for some datasets that would be used for some day-to-day operations and for intelligence-gathering purposes. There is no formal single CRM system to manage media matters identified (other than direct referrals to FtP, which are picked up in the FtP referral process), stakeholder engagement activities, including stakeholders such as the professional bodies, education institutes, registrants' employers, other industry players such as the Department of Health and other regulators. Information can be in the form of recording of direct interaction with those organisations, newsfeeds and social media intelligence. The lack of a CRM system limits the effectiveness of HCPC's day-to-day interaction with those bodies and also means that data is not being captured systematically to enable intelligence gathering. It is the cross referencing of data, often soft data, from stakeholders that can give the most insight. • Website tracking occurs but it is not as sophisticated as other organisations currently. The basic analytics on website usage are there but it is not clear who is using the site. The Comms team are aware of the need for more tracking and personalisation. It is in their plans to improve.	7. HCPC need to implement a comprehensive CRM system to capture soft and hard data used in the process of stakeholder engagement, media & social media analysis and outreach, for the purposes of day-to-day stakeholder engagement and for the capturing of data for insight and intelligence purposes. *Priority 1* **Management response** **Accept** **Action:** Initial scoping work has commenced, although is currently limited to the consolidation of excel data sheets. The intention is move to a CRM using Dynamix. The new ED for Professional Practice & Insight will need to work with the digital transformation team to implement a comprehensive CRM system. **Action Owner:** Digital Communications Manager / ED Professional Practice & Insight **Completion date:** tbc

2.3 Engagement with other bodies

Findings & implication	Recommendation
Positive findings • HCPC already receives some intelligence and data from other regulators and healthcare service providers who employ registrants, etc., and is looking to add more where they have particular relevance. There are potentially rich sources of useful intelligence gained from other bodies and it is good to see this area is growing. • Work is developing now to engage with and learn from the professional bodies and other groups to gain insight on the professions and about individual cases. This outreach activity is newly-formed and only starting to establish links and communication channels. Engagement with professional bodies is largely the domain of the policy and engagement functions at HCPC, but such engagement is informed by intelligence coming from FtP. **Areas for improvement and implication** • There needs to be clarity on who leads the relationship with stakeholders and the inputting of correspondence, intelligence and interactions with them into HCPC systems. Otherwise, there is a risk that the process for drawing intelligence and insight from these new interactions and sources could be patchy in quality, relevance and timeliness. • We noted that currently, referrals from/to other regulators are mainly registrant led, or registrant specific if shared regulator to regulator. Professionals making referrals about fellow professionals registered with HCPC or others should always be encouraged, but is not a substitute for strategic data sharing across regulatory bodies. This is because the broader insights are more likely to be seen at this strategic level.	8. Outreach and other external contact work needs to have clear ownership and data capture standards and processes so that its data, intelligence and insights capture is readily assimilated, complete and accurate. 9. We encourage the further development of data sharing between regulators and other institutions at an aggregate level. *Priority 2*

Management response
Accept **Action:** Will be addressed as part of the ongoing data governance framework and operating model. **Action Owner:** ED Corporate Services **Completion date:** Q4 2021

Key Risk Area 3: Storage and analysis

Background
HCPC have adopted a model of developing a data platform (sometimes referred to as the data 'lake'), which draws data from primary systems such as the register, FtP and education databases. A data warehouse is also being proposed for a later phase, which will enable longer term storage and analysis of growing pool of large datasets. We examined the plans for the storage and analysis of data.

3.1 Data Platform Design & Build Process

Findings & implication	Recommendation
Positive findings • Net Regulate, the previous registration system, had an existing data interrogation tool, which has enabled a basic interrogation of existing databases for registration and FtP purposes. HCPC is not starting from a zero based position. • The new data platform, is being built, with good levels of user consultation, facilitated by external consultants. Considerations included user requirements, what data is missing but would be useful to have. A proof of concept has been presented and considered by the user community and approved by SMT. • A scope of works was created for the data platform, which formed the basis of the design. A high-level design was created with user stories and requirements, which led to the architecture design and proof of concept. A core first step was that the data platform had continuous updates from the registration system, and single drops of data from FtP and education databases. • Three demo reports and a high-level design document has been produced, which provide a good point of reference for establishing the scope of the work and enabling user consultation and senior approval. • Programme has been broken down into three, sensible phases. In line with good practice, business cases are being developed or proposed for the Phase 2 and 3 (see Appendix A). • There is also thought being given to the ongoing development of the data platform after its go live date. **Areas for improvement & implication** • None.	None **Management response** N/A

3.2 Information security & governance

Findings & implication	Recommendation
Positive findings • The data platform has been built using 'security by design'. Access rights have been considered as part of this and the cloud environment in which the data platform is located is certified to ISO 27001. A risk assessment has been carried out. **Areas for improvement and implication** • HCPC need assurance that security by design principles have been applied in practice. We noted that the Head of Information Governance has not been heavily involved in the development of the data platform. In our experience in other organisations, there is a risk that product developers and product owners do not take full cognisance of information security and governance, as their focus and knowledge is centred on the usability of the product. This can leave the finished products lacking in the necessary data governance requirements or lead to expensive project delays, back-tracking or unnecessary change control mid-project. • Consideration will need to be given to the access rights of the data platform going forward as new users and new uses are identified. For example, we have seen a particular risk concerning such systems in other regulators. This is where aggregated information, once 'sliced and diced' for analysis purposes, can easily identify individual registrants. Protocols will need to be in place where such analysed data to avoid the inadvertent identification of registrants, particularly where the data is provided for more general consumption in HCPC and especially if shared externally.	10. Ensure there is a regular check in with data governance experts so the design of the data platform and associated systems and processes are fully compliant with data governance and user access requirements. These should assessed and set as the project progresses and address the risk of identifying registrants through the disaggregation of data when it is analysed. *Priority 1*
	Management response
	Accept **Action:** Will be defined as part of the ongoing data governance framework **Action Owner:** ED Corporate Services **Completion date:** Q4 2021

3.3 Culture and skills to maximise benefits of the platform

Findings & implication	Recommendation
Positive findings • The Insights & Intelligence team has been set up and a lead appointed Intelligence & Insights Manager, which is intended to co-ordinate the use of the platform, maximising its benefits. The lead, recently appointed, will provide the necessary expertise to 'kick start' the use and coordination of user requirements and requests for insights and intelligence going forward. **Areas for improvement and implication** • The power of such systems is reliant on having the right skills, culture and appetite to use them. Getting the most out of the data platform and associated reporting tools will require training. Using the more sophisticated tools planned for Phase 3, machine learning, will require a new level of skill and approach. It will be important that the development of the tools for drawing insights and intelligence will require a change in skillsets, wider changes in the regulatory approach and mind-set. Upstream regulation requires new skills, and a shift from transactional activities to analytical approaches. • The appointment of an insights and intelligence manager provides the initial capacity and capability to maximise the opportunity from the development of HCPC's intelligence and insights work. However, each department needs to upskill and have clear ownership of its data, its insights and intelligence needs and act as the interface between the central insights team and those departments. In our experience, there is a risk that 'data and intelligence' is perceived as someone else's responsibility. Likewise, in the current stage of the programme, it is going to be important that there is good engagement across HCPC with the early work using the data platform. Getting that initial involvement in building useful reports will create buy-in and provide credibility about the data platform amongst HCPC colleagues in general.	11. HCPC need to ensure that it upskills the whole organisation and changes the culture so that data and intelligence is embedded in the 'the way the organisation does things'. *Priority 1*

Management response
Accept   **Action:** Will be addressed as part of the project implementation and operating model   **Action Owner:** ED Corporate Services   **Completion date:** Q4 2021

Key Risk Area 4: Reporting and Delivering Regulatory Responses to Intelligence

Background
In order to report effectively on intelligence, organisations need to ensure that they are balancing the requirements of regulatory reporting processes with internal reporting mechanisms designed to enhance the overall intelligence gathering strategy across the organisation.

4.1 Existing reporting mechanisms

Findings & implication	Recommendation
Positive findings • Reporting requirements have always existed for standard reports on internal performance and the characteristics of the registrant community. These routine and ad hoc reports provide a strong point of reference for reporting requirements. Having this baseline structure in place means that HCPC have some clear early goals and an established framework to build upon. • The addition of new EDI reporting requirements has also given a focus on designing reports and the data collection requirements and methods. The intelligence work thus has some clearly defined 'early wins', which should help HCPC to design an effective process for building new reports and building intelligence. The data platform will substantially de-risk the current ad hoc report building, which is currently building SQL queries and requiring the interrogation of live systems, both of which are best avoided. • For FtP cases, FtP staff are trained to pass on intelligence to other parts of HCPC or other regulators as required. Systematic process for assessing intelligence from a case, including information which relates to the responsibilities of others. • The 'emerging concerns' protocol with the CQC is in place and HCPC share information with CQC as part of CQC's pre-inspection planning, (although HCPC recognises that this work needs further development).	None
	Management response
	N/A

4.2 Vision for future reporting

Findings & implication	Recommendation
Positive findings • The reporting potential that the new data platform offers is significant, in the way in which has been developed. Work has begun to develop a pipeline of reporting and coverage areas. This will lead to a set of data requirements. • Work is being done in the insights team to compare with other regulators – we think this will be particularly valuable as many others are further ahead than HCPC and lessons learnt will be valuable. Many of the points we raise in this report for HCPC to consider reflect some of the issues that other organisations have experienced.	12. As part of building the insights and intelligence capability, consideration is needed on the reporting requirements – what (and why), when, to whom, how often. A prioritisation process needs to be formulated based on MoSCoW[1] principles, referenced to HCPC's strategy and risks. *Priority 1*
Areas for improvement and implication • There needs to be clarity on what is reported to when and how often. Clarity on what is required and to whom is critical to understand in order to prioritise the 'must have', 'should have' and 'could haves'. Levels of detail, report uses and their benefit to HCPC's strategy and operating requirements are key. Such an evaluation framework will be required as the delivery of the intelligence service is developed and when it becomes part of routine practices.	**Management response** **Accept** **Action:** Will be defined as part of the project and ongoing data governance frameworks **Action Owner:** ED Corporate Services **Completion date:** Q4 2021

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[1] Must have, should have, could have

4.3 Escalation and regulatory impact

Findings & implication	Recommendation

Positive findings
• HCPC have an established range of regulatory responses already to insights and intelligence, including policy development, adjustments to education & CPD, direct intervention on individual cases through FtP, etc.
• There are established channels where responses are made typically, usually led or actioned by the policy team. However, some responses have required and engendered a coordinated broader cross-HCPC response. For example, the health and well-being in the profession action plan has involved cross-organisational input.
 	
Areas for improvement & implication
• It is clear that there lacks a structure and clarity so far on the ownership of cross departmental responses to intelligence learning and developing and instigating a regulatory response. The governance and responsibility needs to be made clearer. We see this as a critical part of the intelligence and insight end-to-end process.
• More specifically, there is no forum for drawing in, evaluating intelligence and insights and deciding on the best regulatory response to the intelligence or whether to respond at all. SMT are currently the custodians of this, but in our experience in other organisations, the time taken to review and the frequency of reviewing intelligence means that SMT is unlikely to be the most efficient forum to respond. An intelligence group should be set up to review cases and emerging insights, to propose responses, monitoring progress against previously-identified insights and intelligence, recommending to SMT the course of action for new items. Such a group should have delegated authority to make key decisions and also have the function of triaging matters that are presented to them for decision, so they are most relevant to regulatory priorities, include ensuring alignment to the PSA's requirements and HCPC's risks and risk appetite.
• Success of the regulatory intervention needs to be tracked to ascertain its impact. The design of the intervention needs to build in the means by which the intervention's implementation and impact is measured.
	13. In a similar way to governance and ownership of data and the role of the intelligence and insights system, there needs to be clear authority and governance on the information sharing, reporting and the coordination and tracking of regulatory responses to insights and intelligence:
	
	    a. A forum for the initial assessment of intelligence
	
	    b. Escalation protocols for the escalation of intelligence to more a more senior level
	
	    c. A senior cross-HCPC group is for prioritising actions and making decisions on the best regulatory interventions and have the authority to instruct others in HCPC to build the intervention required.
	
	    d. A mechanism to track delivery of the intervention and measure its success.
	
	Priority 1

Management response
Accept **Action:** Will be defined as part of the project and ongoing data governance frameworks **Action Owner:** ED Corporate Services **Completion date:** Q4 2021

A   Additional Information

Data Platform – Proposed Phases

Phase	Main tasks
Phase 1	• Getting key datasets from primary systems (registration, FtP & education) into the platform. • Establishing mechanism for refreshing data from primary systems. • Understanding requirements
Phase 2	• Adoption of processes to enable use of the new environment • Build data model for export to data warehouse
Phase 3	• Analytics layer – evaluation & adoption of machine learning, cognitive etc.

B   Audit objectives, Risks & Scope

Terms of reference	
Objectives	As part of the Heath & Care Professions Council internal audit plan for 2020/21, as approved by the Audit & Risk Assurance Committee, we are undertaking an audit of Intelligence Gathering.
Key risk areas	• Governance and oversight of intelligence gathering. • Data collection, assimilation, analysis and storage provides sufficient depth and breadth of coverage, exploiting the range of data sources available internally and externally. • Methods and systems for drawing intelligence from data, both planned and in place, are appropriate, properly validated and proportionate. • Reporting mechanisms for the intelligence provide the information to the right people at the right time. • Translation of intelligence is made into the right regulatory responses.
Scope	Our focus is on the end-to-end activities relating to the gathering of data, whether as part of normal regulatory activity or proactively. We will consider the means by which HCPC converts data into meaningful intelligence. Both intelligence on individual registrants, cohorts of registrants and wider learnings for individual professions, healthcare professions in general and HCPC will be included. Intelligence sharing between the healthcare profession regulators and systems regulators, law enforcement will apply. The scanning of traditional and social media will also be included. Research, polling and opinion sources are included. The review will not test in detail the efficacy of current data and intelligence gathering, analysis and dissemination processes. It will examine the design of the current processes alongside evaluating the intended design of new and future developments.
Approach	We recognise that HCPC is on a journey with its intelligence gathering work and use of intelligence. Some work is in place and has been operating for some time, but much is being developed currently or featured in future plans. The approach to the review will recognise the status of the elements of intelligence gathering, providing assurance about what is built already and what is planned for the future. The work will entail interviews with staff across the organisation, as directed by the review sponsors. We will also walk through current procedures and examine plans and other documentation relating to future processes. Interviews will be via Teams.

C   Audit definitions

Opinion/conclusion	
■ (Green)	Overall, there is a sound control framework in place to achieve system objectives and the controls to manage the risks audited are being consistently applied. There may be some weaknesses but these are relatively small or relate to attaining higher or best practice standards.
■■ (Green-Amber)	Generally a good control framework is in place. However, some minor weaknesses have been identified in the control framework or areas of non-compliance which may put achievement of system or business objectives at risk.
■ (Amber)	Weaknesses have been identified in the control framework or non-compliance which put achievement of system objectives at risk. Some remedial action will be required.
■■ (Amber-Red)	Significant weaknesses have been identified in the control framework or non-compliance with controls which put achievement of system objectives at risk. Remedial action should be taken promptly.
■ (Red)	Fundamental weaknesses have been identified in the control framework or non-compliance with controls leaving the systems open to error or abuse. Remedial action is required as a priority.

Any areas for improvement are highlighted with the key recommendations in the right-hand columns. The symbols summarise our conclusions and are shown in the far right column of the table:

Good or reasonable practice   ✔

An issue needing improvement   🚩

A key issue needing improvement   ✖

Recommendation rating	
Priority ranking 1:	There is potential for financial loss, damage to the organisation's reputation or loss of information. This may have implications for the achievement of business objectives and the recommendation should be actioned immediately.
Priority ranking 2:	There is a need to strengthen internal control or enhance business efficiency.
Priority ranking 3:	Internal control should be strengthened, but there is little risk of material loss or recommendation is of a housekeeping nature.

D   Staff consulted during review

Name	Job title
Jacqueline Ladds	Executive Director, Policy & External Relations
Neil Cuthbertson	Executive Director of Digital Transformation
Katherine Timms	Head of Policy and Standards
Sam Vale	Insight and Intelligence Manager
Tony Glazier	Digital Communications Manager
Jason Roth	Infrastructure Manager
John Tallis	Assurance and Development Analyst
Roy Dunn	Chief Information Security & Risk Officer
Laura Coffey	Head of FTP
Richard Houghton	Head of Registration
Brendon Edmonds	Head of Education
Tian Tian	Director of Finance
Claire Holt	Director of HR & OD

We would like to thank these staff for the assistance provided during the completion of this review.

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