Audit and Risk Assurance Committee

Meeting Date	11 June 2025
Title	Strategic risk register
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Executive Sponsor	Claire Amor, Executive Director of Corporate Affairs

Executive Summary

The presented report sets out the HCPC's strategic risks as of May 2025.

The risk register details:

- 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 (March 2025).

The risk score for strategic risk 5 has reduced to from 12 to 10.5, which remains a high/medium risk. With the fee increase live from April 2025 and the balanced budget for 2024-25 this risk has reduced. The ongoing risk around partners contracts, and emerging risks around international application volumes and SMS/cyber fraud means the impact score has gone down by 0.5 instead of 1 to reflect the complexity.

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	The next report to Committee will be presented in September 2025. A full strategic risk register review will take place alongside the strategy review.
Financial and resource implications	None as a result of this paper.

Associated strategic priority/priorities	Continuously improve and innovate Build a resilient, healthy, capable and sustainable organisation
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	This paper includes the assurance of HCPC data and sustainability as related to regulatory and business practices.
Reason for consideration in the private session of the meeting (if applicable)	Not applicable

11 June 2025 Audit and Risk Assurance Committee

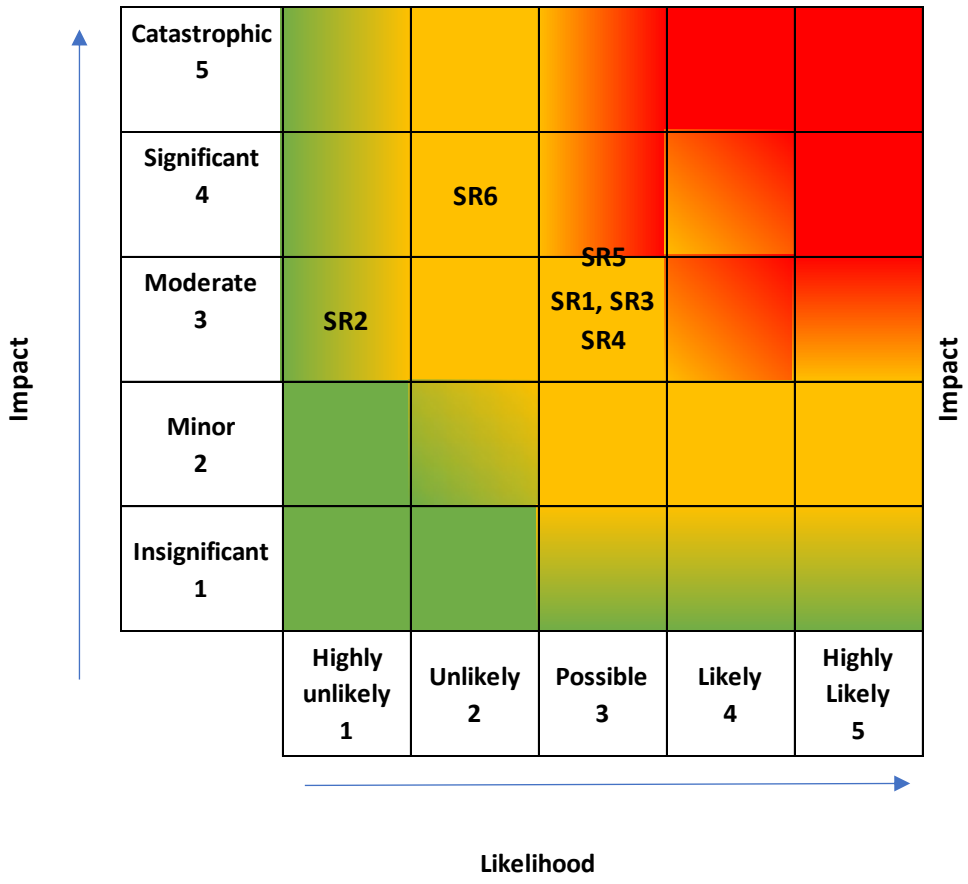
Strategic Risk Register

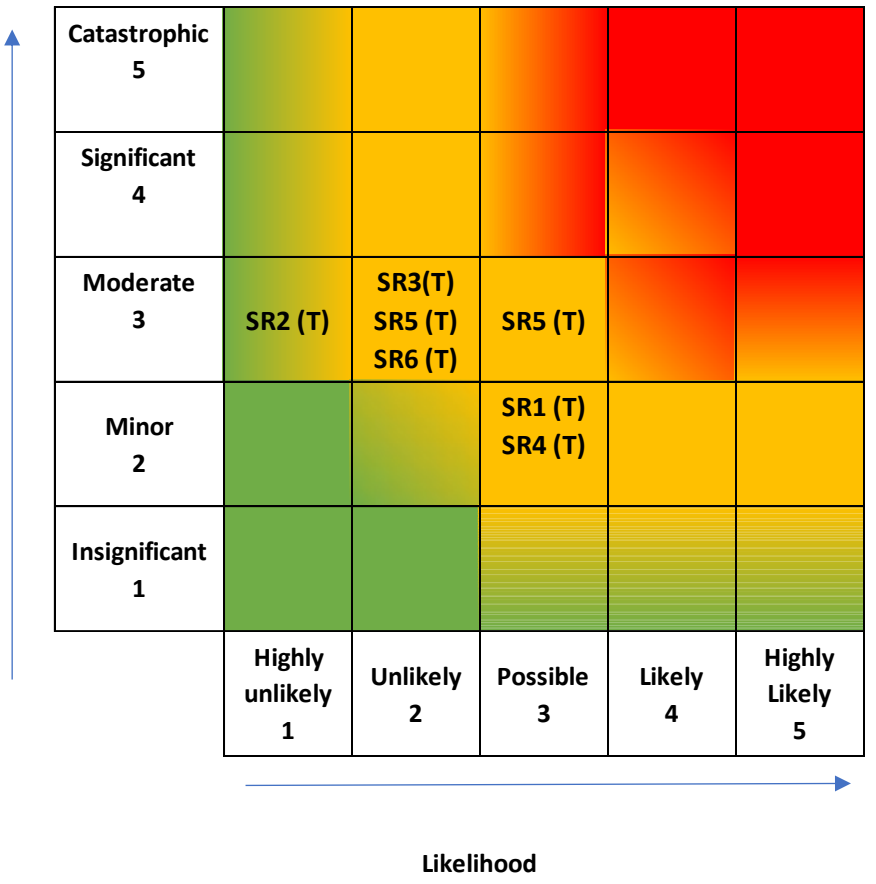
Anna Raftery, Head of Assurance & Compliance

HCPC Strategic Risks

Summary of strategic risks

Strategy	Strategic Risks - from November 2024	Risk Description	May-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, effecting our ability to protect the public.	Not delivering or meeting: 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.	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.	10.5	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 due to: 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





Mitigation key	
Preventative	
Monitoring	
Detective	
Remedial	
Horizon scanning	
Best practice development	
Communication	

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	
	Not delivering or meeting: 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.

Date	Risk Owner
May-25	Executive Director of Education, Registration & Regulatory Standards

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	3	x	3	9
Target risk	2	x	3	6

← No Change

Current Risk Influencers

- ✓ The 2023-24 PSA performance report published Aug 2024 shows we met 16 of 18 standards.
- ✓ Engaging with regulatory reform programme, and are next on the list to go through the process.
- ✓
- × Tone of voice work still to be conducted in the wider organisation
- × High number of corporate complaints due to delays in the international application process
- × International application assessments outside of KPIs due to spike in applications and ongoing recruitment. Expected to be within KPI by July 2025

Risk Appetite

Regulation = Measured; Influence & Leadership = Seeks

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.
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

- 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.
- Wide range guidance on HCPC's regulatory processes available on our website.
- Modern education QA model. Regular feedback sought and acted upon to improve process application and stakeholder experience. Education provider self-service portal in place improving experience of education stakeholders.
- 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 how other regulators have improved processes.
- Monitoring regulatory performance through performance reporting and KPIs.

Areas of Development	Progress 2024-25	Mitigation
Registration Assessment model	Rebalance documentary assessments and the use of tests of competence by reducing / removing use of further information (Q2) Procure third party assessment partner to develop tests (including possibility of ongoing maintenance of tests (Q2-3) Develop standardised tests and testing framework for high volume professions (Q4 and into FY2026-27)	A more balanced approach to international assessments will give more confidence in decision, and reduce delay complaints.
Customer contact	Complete Commercial agreements to establish new strategic partner to delivery Customer Contact services for the HCPC (Q1) Complete the implementation of an as-is replacement of existing telephony system with new strategic partner removing incumbent supplier risk (Q3) Complete definition of to-be requirements describing the business requirements for the new customer contact requirement (Q3-4) Begin implementation of the to-be organisation changes and technology configurations to support the new to-be Customer Contact capability (Q3 – 4)	More accessible and available communication through an improved customer contact services allows us to support people through their regulatory processes more effectively.
Partners transformation work	Review and implement new contractual arrangements for Partners including new DocuSign (Q3 and ongoing) System and process improvements to regulatory function payment pathways to improve data quality and financial controls (Q3-4) KPI and QA development work across regulatory functions (Q3)	A new model for how we approach and manage our partners will allow us to have more confidence in their performance.
FTP	Embed newly established legal team: all posts filled, ways of working established (Q2) Continue to develop how we investigate front loaded cases internally. This year, we will manage cases in-house at the Post ICP stage for the first time. We will also grow the caseload and complexity of cases at the Pre-ICP stage (Q4) Continue our work to change our operating model to improve the efficiency of FTP investigations be introducing streaming of non-frontloaded investigations (Q2) Introduce tools needed to professionalise our in-house legal services in line with the investment case submitted for this year (Q4) Continuation of improvements to the support and guidance we provide to witnesses, including updates to the HCPTS website (Q3) Scheduling process review phase 2. Continue to look at efficiencies with the listing process to reduce the time taken to list a matter for a final hearing (Q4)	FTP's continued improvement in performance, while also developing new approaches to delivering regulatory duties, ensures that FTP decision making is fair, proportionate, and of good quality.

Reporting period commentary

The PSA performance review for 2024-25 has completed and we are working with the PSA to finalise the report ahead of publication by the end of June 2025.

The partner transformation work continues at pace. Communications going to all partners with information and updates for new contracts.

FTP new operating model established and recruitment for remaining vacant roles progressing.

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

Date	Risk Owner
May-25	Executive Director of Education, Registration & Regulatory Standards

Risk Summary

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.

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	3	x	1	3
Target risk	3	x	1	3

← No Change

Current Risk Influencers

- ✓ Four country resource in place in for Professionalism and Upstream Regulation better enabling UK wide prevention engagement.
- ✓ Revised SCPEs and guidance on social media live Sept 2024. Easy read guide for SCPEs has been produces, 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 & Leadership = Seeks

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

Areas of Development	Progress 2024-25	Mitigation
SETs review	Pre consultation engagement (Q2-3) Publicly consult on proposed amendments to the standards of education and training (Q3) Agree new standards to be published in the summer of 2026 (Q4) (come into effect date tbc)	Thorough consultation with a wide range of stakeholders gives us confidence our standards are proportionate and accessible
Scope of practice	Support registrants and employers to meet the HCPC's expectations for the safe and effective optimisation of scope of practice. Develop materials on supervision and delegation and deliver a series of dedicated workshops (Q3)	Supporting registrants and employers to understand scope of practise supports upstream regulation
Professional Liaison Service	Enhance our ability to use our data and other insights to develop a more targeted and risk-based approach to our prevention work (Q3) Review and plan the future requirements of the service (Q3) Develop new and engaging ways to deliver learning and influence to extend the reach of the service (Q3-4)	Utilising the source of stakeholder feedback received by the professional liaison service provides insight to registrants understanding of the standards.

Reporting period commentary

We continue to meet with professional bodies to discuss the standards. We have also hosted workshops with service users and learners. These have been helpful to hear about their perspectives on the standards and experiences of education providers.

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.

Date	Risk Owner
May-25	Executive Director of Education, Registration & Regulatory Standards
	Executive Director of Resources

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.

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

← No Change

Current Risk Influencers

- ✓ Registrant datahub has been published, providing detailed insight into the population of our registrants.
- ✓ IT team delivered successful first modules of new data platform, supporting EDI reporting, meeting the needs of the HEE data sharing project and improving access to core registration data.
- ✓ 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 reporting data continues
- ✗ 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. I&A team working with Ops teams to resolve and mitigate against continued imputing of new bad quality data.

Risk Appetite

Data = Open

Risk appetite is within tolerances with improved confidence of the quality of our data, and advancing of our reporting capabilities.

Current risk level is within risk appetite

Mitigations in place

- Publication of FtP, Education and Registration information and datasets through annual reports and FOI requests.
- Insights and Intelligence Framework agreed, setting out priorities and approach for data analysis.
- Dedicated resource for Analysis and Intelligence and Data Engineer in place.
- Interactive data hub launched 21 May 2025
- Renewals data dashboard accepted report now in place agreeing renewals counts of actuals and previous windows.

Areas of Development	Progress 2024-25	Mitigation	Reporting period commentary
Research	Commission research into the impact of the increasing use of AI by registrants working across our professions, settings and across the UK (Q2)	This research will give us insight on areas we should /could address as a regulator	The new data hub launched on 21 May 2025. The interactive dashboards allow all stakeholders to explore our data in their own time. The dashboards include register over time, and how this looks under different characteristics and/or location, as well as diversity data. the research strategy is being developed in order to develop our thinking and approach to research going forward.
Data quality and infrastructure	Improve our external data reporting capability: workforce profiles (Q1), student/learner progression to HCPC registrant (Q2) and ongoing improvement to self-service reporting tools available on our website (Q2-4) Continue to further our diversity data enhancements and more complete data sets on registrant employment, which we expect will improve our visibility of emerging concerns relating to individual employers or locations. This insight will also be used to inform our professional liaison outreach targeting (Q3)	By continuing to improve the quality of our data and reporting capabilities we can be confident in the reporting we share	
Insights and Analytics	Continue to publish analyses of our data to provide insights to our stakeholders. This will include more detailed analyses of our FTP diversity data, further developing our data hub, enhancing our professional profiles dashboards and providing insights from registrants' CPD activity (Q3) Collaborate and share our data across the sector in order to enhance public safety and professional practice. This will include exploring participation in a cross-regulator database, increased sharing of our data with professional bodies and further education data sharing and analysis (Q4)	By sharing our data openly and providing more in depth analysis we are directly able to influence the health, safety and wellbeing of the public.	

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.

Date	Risk Owner
May-25	Executive Director of Corporate Affairs

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	3	x	3	9
Target risk	3	x	2	6

← No Change

Current Risk Influencers

- ✓ Professional liaison consultants in place in each of the 4 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.
- ✓ 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 CRM forms part of the tech roadmap agreed by Council , investment for 2024-25 will focus on building the platform, with the implementation for stakeholder engagement and managing feedback and complaints deferred to 2025-26.

Risk Appetite

Influence & Leadership = Seeks

We have an 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

- ELT relationship building and liaison with key stakeholders particularly Government Departments, professional bodies, other regulators, unions.
- Personal engagement plans for Chair & Chief Executive in place. Engagement management group meets regularly to monitor and plan engagement strategically. Operational level relationship manager engagement for key stakeholders in place across HCPC.
- EDI strategy and action plan informed by independent audit of EDI practice. EDI stakeholder forum & internal EDI employee forum.
- Policy statement on approach to MOUs in place, a number of MOUs agreed with key stakeholders.
- Professional body forum in place, including regular meetings both virtually and in person.
- Public consultation process in place, including equality impact assessments (EIAs) to capture the EDI element.

Areas of Development	Progress 2024-25	Mitigation
Developing the HCPC's next Corporate Strategy	Review the success of the current Corporate Strategy (2021–26) and conduct engagement with a wide range of stakeholders to develop our next Corporate Strategy (Q2-3) Carry out a stakeholder perceptions survey and targeted user research to support our Corporate Strategy refresh and digital roadmap implementation (Q2)	An informed approach to forming the new corporate strategy allows us to ensure our next strategy is robust and proportionate
Equality, Diversity and Inclusion	Develop a network of EDI champions across the organisation to support driving forwards EDI commitments and enhance EDI resilience (Q2) Publish FTP report with further analysis of our EDI data (Q3) Contribute to the development of the next Corporate Strategy to ensure EDI is embedded throughout (Q1-3)	Continuing to show commitment to EDI through actions not only builds trust and credibility, but ensures our future strategy is appropriately informed.
Stakeholder engagement	Build on a successful Chair/Chief Executive programme of relationship building and implement a refreshed stakeholder engagement plan that includes activity aligned to the HCPC's communication campaigns (Q3) Begin to establish a single customer relationship management (CRM) platform to allow better sharing of information and coordination of communication, engagement, quality assurance and complaint handling activity (Q4) Seek to amplify the voice of the service user in our work through targeted engagement with patient representative bodies such as the Patients Association (Q2)	Stakeholder engagement being accessible and informative helps us build relationships and understand their perspectives
Strengthening our communication capabilities	Complete all phases of the resourcing and recruitment plan (Q4) Deliver SETs communication campaign (Q4) Working with IT and procurement colleagues, deliver an upgrade to our web platform to allow digital roadmap delivery (Q4) Agree brand refresh and roll out new support materials (Q3)	As above

Reporting period commentary

On 20 May 2025 we hosted a meeting of our Professional Body Forum. Discussion topics included the review of our standards of education and training (SETs), corporate strategy development, our upcoming consultation on sanctions policy, advance practice webinars, and a joint discussion on artificial intelligence.

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	
	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.

Date	Risk Owner
May-25	Executive Director of Resources

	Impact		Likelihood	Risk Score
Inherent risk	5	x	5	25
Current Risk	3.5	x	3	10.5
Target risk	3	x	3	9

← Decrease

Current Risk Influencers

- ✓ Budget factors in projected future benefits of investments, to be validated at project initial phase and tracked to ensure deliver.
- ✓ We ended 2024-25 with a surplus budget and meeting our reserves policy or realisable net assets
- ✓ Latest fee rise in effect from 29 April 2025.
- ✓ People strategy in place: BDO audit shows good progress. Performance against KPIs good - sickness absence and turnover reducing. APDR participation for 2024-2025 was 100%.
- ✓ Two Speak Up Guardians in place from senior leadership. Annual report due to ARAC in November 2025
- ✓ Carbon baseline for HCPC now established with action plan for improving sustainability being developed with expert input and involvement of ELT and SLG.
- ✓ Publication of Gender and Ethnicity Pay Gap Reports
- × 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.

Risk Appetite

Financial = Measured; People = Open

With the most recent fee rise implemented, and a stable budget and reserves, the impact of this risk is reduced, and the risk appetite is within tolerances.

Current risk level is within 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 on efficiency realisation.
- 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.
- 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 and seeks to identify training needs.
- 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 in areas such as data protection, bribery, EDI.
- Employee Forum acts as a consultation group for organisational change.
- 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
- Adherence to Partner processes in relation to recruitment, onboarding and Partner Code of Conduct (updated Jan 2024)
- Effective IT system design maintaining confidentiality, integrity and availability of data. Digital transformation strategy provides roadmap for improving our IT systems.
- 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 and processes.
- 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 for corporate plan.

Areas of Development	Progress 2024-25	Mitigation
Delivering the technology roadmap	As part of wider customer contact strategy replace our legacy telephony solution to enable further improvements in the way we interact with registrants and other stakeholders who contact us (see milestone 2) (Q4) Scope and develop a foundational single CRM that will create a platform for bringing together all our customer information (Q4) Complete our journey to the cloud by decommissioning our remaining on-premise technology services and replacing these with future-proof cloud base services" (Q4) Continue to develop and enhance the data platform to provide a single version of truth for HCPC data and enable work on data driven insights (milestone tbc)	The tech roadmap gives us a multi-year plan to develop our digital and tech capabilities.
People strategy	Deliver year 5 of our People Strategy: focus on attracting high quality candidates via our recruitment portal and workforce planning to build future resilience. Develop an updated People Strategy for the future to ensure that the HCPC continues to benefit from a highly engaged and capable workforce (Q4) Monitor the impact of the introduction of the Freedom to Speak Up Guardians scheme (Q4) Maintain other speaking up and listening opportunities including Let's Talk sessions with senior leaders, the Employee Forum and our regular pulse surveys (Q4)	The people strategy ensures we are recruiting and retaining high quality employees. It also supports the wellbeing of our staff.
Improving financial sustainability and resilience	Continue with regular, transparent fee reviews to maintain the HCPC's financial sustainability and enable investments in further improvements. Planning under way for next consultation (Q4) Further develop our financial and procurement systems, to help ensure value for money and continued improvements in financial management, including through invoice processing automation (Q1), more efficient accounting for registrant income (Q3) and use of improved, AI-enabled reporting tools (Q2)	Resilient financial capabilities improves the sustainability of the HCPC
Improving our environmental sustainability	Maintain and optimise the HCPC's office estate to provide a safe and sustainable working environment, including progressing plans to end our reliance on gas-powered heating (Q4) Implementation of an Environmental Management System to improve our ability to monitor the environmental impact of our operations (Q3) Enhance procurement policy to include a focus on sustainability and supplier diversity (Q2)	As a modern a conscientious organisation our environmental sustainability plan ensures we are in line with requirements.

Reporting period commentary

Following our consultation last year, the legislation to implement our latest proposed fee increase has now been approved in both the UK and Scottish Parliaments. The new fee came into effect from 29 April 2025. With this increase, the balance 2024-25 budget and improved reserves, the risk has decreased.

However, the risk is still above target in view of the continuing risks on partners/ Somerville, level of international applications, and SMS/cyber fraud. As some of these risks have emerged more recently there are new to considering the risk score. While we generally avoid using half scores, due to this complexity the impact score has come to 3.5.

The risk score has overall decreased from 12 to 10.5, however this remains high/medium, and outside of risk appetite.

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.

Date	Risk Owner
May-25	Executive Director of Education, Registration & Regulatory Standards
	Executive Director of Corporate Affairs

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

Current Risk Influencers

- ✓ The Government have confirmed in a Written Ministerial Statement, its commitment to reforming the regulation of healthcare professionals across the UK and delivering legislation relating to the Health and Care Professions Council in this Parliamentary period.
- ✓ 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.
- ✗ 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.
- ✗ Government leadership changes, and challenges in the health landscape could impact on the progression of regulatory reform due to other priorities.

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. Risk reduction also requires greater clarity on timing of HCPC's reform and confidence that funding and resources in place realise the opportunity of reform.

Mitigations in place

- Communications and strategic engagement, including parliamentarians and cross-party engagement, on regulatory reform supported by Luther Pendragon.
- HCPC engagement on Health and Social Care Bill led to positive change.
- Some dedicated policy resource in place.
- Participation in cross regulator analysis of draft legislation and other regulatory themes, HCPC's comments on draft legislation have been provided.
- 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 reform.
- HCPC medium term financial plan in place to seek to make provision for regulatory reform. Consultation expected to launch Sept 22.

Areas of Development	Progress 2024-25	Mitigation
Education	Help education providers and others understand our regulatory requirements, and current sector trends, by considering our assessments from the 2024-25 academic year, building on previous analysis, and publishing / engaging on key findings, in a user focused way (Q3)	Supporting understanding of the value that regulation adds
Registrant health and wellbeing	Review our progress against and the impact of the Registrant Health and Wellbeing Strategy, identifying any further work we can undertake to improve the experience of our regulatory processes for those involved (Q3)	As a companionate regulator, supporting our registrants health and wellbeing can positively impact patient safety
New registrants transition to UK practise	Through our Insights for Employers programme and the Employer Hub, increase understanding of the challenges faced by registrants who are new to UK practice, and encourage and support employers to improve the narrative around and support for international registrants (Q3)	Supporting registrants new to UK practice supports addressing the workforce crisis
Shaping the future of regulation	Continue to raise the benefits to patient safety and the quality of care that regulatory reform will bring when meeting with stakeholders and responding to relevant departmental consultations (Q1-4) Ongoing engagement and contribution to the DHSC's regulatory reform work (Q1-4)	Increased engagements with wider stakeholders ensure understanding the value of our work, encouraging support for reg reform changes

Reporting period commentary

The Government's initial focus will be to modernise the regulatory framework for doctors under the General Medical Council (GMC) before moving on to make changes to the HCPC and the NMC.

The Government anticipates they will be in a position to consult on the GMC legislation in late 2025 and to deliver legislation for the HCPC and NMC within the current parliamentary period