

Council, 27 March 2014

Education Department work plan 2014-15

Executive summary and recommendations

**Introduction**

The attached document is the Education Department's proposed work plan for 2014–15. It details the Department's main areas of work and priorities for the financial year April 2014 – March 2015 and includes a progress report on the 2013–14 work plan. The work plan is intended to supplement the Council's strategic intent document and sits alongside other departmental level strategy and work plan documents. It is a working document and is therefore always under review.

**Decision**

The Council is asked to discuss and approve the Education work plan 2014-15 (subject to minor editing and any agreed changes).

**Background information**

None

**Resource implications**

The resource implications have been incorporated into the draft HCPC budget 2014-15.

**Financial implications**

The costs associated with all activities outlined in the work plan have been incorporated into the draft HCPC budget 2014-15.

**Appendices**

Education Department work plan 2014-15

# Education Department - 2014–15 work plan

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## Introduction

The Education Department work plan details the main areas of work for 2014–15 and sets out how the Department will develop, review and progress.

The work plan is underpinned by the Council's strategic intent and demonstrates how the Department's work continues to contribute towards the achievement of both the objectives of Council and the Education and Training Committee (ETC).

## The Council's strategic intent

The Council's current strategic intent (2012 to 2015) identifies the organisation's vision for the future and those areas that form the Council's strategic priorities. The document identifies six central objectives; all of which underpin and shape the key areas of work and priorities within this work plan. An example of the objectives and links to this work plan is below.

### Objective 1: Good governance

To maintain, review and develop good corporate governance

Example references in this work plan - departmental budget, risk register, departmental forecasting of operational processes, departmental training, major project (Education), council and committee member training and support.

### Objective 2: Efficient business processes

To maintain, review and develop efficient business processes throughout the organisation

Example references in this work plan – review standards, review processes, major project (Education), major projects (Partners, Registrations, Finance) partner recruitment and training, ISO accreditation and partnerships with professional and system regulators.

### Objective 3: Communication

To increase understanding and awareness of regulation amongst all stakeholders

Example references in this work plan – publications, website, education seminars, partner training, participation in inter-regulatory and higher education forums, Education Update, HCPC in focus, social media, service user and carer involvement in education and training, lay visitors on approval panels and major project (web deployments).

### Objective 4: Build the evidence base of regulation

To ensure that the organisation's work is evidence based

Example references in this work plan – education seminars, annual report, Education Update, service user and carer involvement in education and training and lay visitors on approval panels.

### Objective 5: Influence the policy agenda

To be proactive in influencing the wider regulatory policy agenda

Example references in this work plan – , new professions and recent profession reviews.

### Objective 6: Engagement in the four countries

To ensure that our approach to regulation takes account of differences between the four countries.

Example references in this work plan – education seminars, annual report, and participation in inter-regulatory and higher education forums and partnerships with social work regulators in Wales, Northern Ireland and Scotland.

## **The Education Department**

The Education Department's main responsibilities are:

- assisting the Council in approving programmes which professionals must complete before they can register with us;
- assisting the Council in monitoring programmes which professionals must complete before they can register with us;
- co-ordinating approval visits;
- co-ordinating annual monitoring assessment days;
- co-ordinating the consideration of annual monitoring submissions, by correspondence;
- co-ordinating the consideration of major change submissions, by correspondence;
- publishing visitors' reports from approval visits;
- publishing the register of approved programmes;
- co-ordinating the consideration of complaints about approved programmes;
- assisting in the selection and training of Partner visitors; and
- communicating with education providers and education stakeholders.

## **This document**

This document aims to set out the work priorities for the financial year April 2014 – March 2015, and provide a basis against which the work of the Education Department can be planned and measured.

This work plan attempts to show how the standard operational work, supporting activities, development work and projects have been scheduled to ensure successful completion, given the resources and time restraints. The Education Department is both proactive and reactive in its work. We will revisit and update this work plan throughout the year. The Department will be flexible in the delivery of its work plan in order to respond accordingly to both internal and external factors. This document will be kept under review.

## Priorities 2014–15

The main priority for the Department is the day-to-day operation of the approval and monitoring processes. The focus of the work in this area falls into three key areas. Firstly, we will continue to focus on the consequences of regulating social workers in England and the incorporation of both pre-registration and approved mental health professional (AMHP) programmes into our approval process. Secondly, we will continue to focus on the consequences of regulating, practitioner psychologists and hearing aid dispensers', and their incorporation into our monitoring processes. Thirdly, we will focus on the consequences of the revised standards of proficiency for a number of professions and the assessment of programmes against these through our monitoring processes. Fourthly, we will continue to respond to the consequences of curriculum changes for paramedic and operating department practitioners and any new programmes (at BSc (Hons) level) proposed as a result.

For social worker programmes in England, the on-going work will include the engagement with our approval process as well as on-going communication and relationship building work. There are approximately 80 education providers that were due to be visited over three academic years (2012–13, 2013–14 and 2014–15), which equates to four financial years (2012–13, 2013–14, 2014–15 and 2015–16). We are currently approximately half way through this process. We envisage the peak approval visit activity will take place in quarters one and four of this financial year (2014–15) and anticipate approximately 35 visits. We anticipate that the next financial year (2015–16) will see a reduction in social worker approvals work compared to the last two financial years.

The impact of social workers on our monitoring processes will begin to be felt in this financial year, as those who were visited first are subject to annual monitoring. There will be a stepped increase over the next few years as all programmes are required to integrate into this process.

For AMHP programmes in England, the on-going work will include engagement with our approval process as well as on-going communication and relationship building work. There are approximately 20 education providers that were due to be visited over two 2013–14 and 2014–15), which equates to three financial years (2013–14, 2014–15 and 2015–16). We are currently approximately one third of the way through the process. We envisage the peak approval visit activity taking place in quarters one and four of this financial year (2014–15) and anticipate approximately 15 visits. We anticipate this financial year (2014–15) will see a stepped increase from last financial year (2013-14). The impact of AMHP programmes on our monitoring processes will not be felt until the next financial year (i.e. the 2015–16 academic year).

For practitioner psychologists and hearing aid dispensers' programmes, the on-going work will focus on their continuing integration into our monitoring

processes and associated communication work. Their integration into our monitoring processes has been phased over a number of years dependent upon the timing of their original approval visit. To date, approximately two thirds of all programmes have engaged with the annual monitoring process. This financial year (2014–15) will be the final year of integration and the workload will be on a par with the last financial year.

For nine professions, the on-going work will focus on ensuring the revised standards of proficiency are now embedded in their programmes through our annual monitoring process. For these professions, their standards were published in the last financial year (2013-14) and implemented in approved programmes at the start of the 2013-14 academic year. We anticipate this work to continue over the next five financial years (2014-15, 2015-16, 2016-17, 2017-18, 2018-19) as revised standards of proficiency across other professions are published on a rolling basis.

For paramedic and operating department practitioner programmes, the on-going work will focus on responding to the significant changes to the curriculum guidance for these professions. It is anticipated that this will result in an increase in programmes being delivered at a higher academic level (BSc (Hons)). We envisage the peak approval visit activity taking place in quarters one, three and four of this financial year (2014–15).

Over the last five years we have seen our priorities and resources increasing in the area of communication and relationship management. This year, we will continue to balance our commitment to all professions and stakeholders alongside the need to tailor and focus on our message to social workers in England. Key communications themes will focus on the introduction of the new service user and carer standard and the social worker visits in years two and three of our visit schedule.

This year, the Department will continue to participate in much of the education focussed development work outlined in the Policy and Standards work plan. It is envisaged that the majority of the collaborative working between the two departments will fall into three broad categories, namely revisions to standards (proficiency, education and training and conduct, performance and ethics), revisions to guidance (disabled persons guide and conduct and ethics for students) and post registration annotations.

This year, the Department anticipate that its project work will focus primarily in the area of major projects. One project in particular, the 'Education Systems Build' (ESB) project will continue to take precedence for the Department. This project is due conclude towards the end of this financial year (2014–15) and will see a new back office information system being implemented which will necessitate a degree of business change for department employees. The Department will also participate in a number of other major projects to varying degrees. Due to the resource intensity and comprehensive nature of the ESB project, there will be very few small and business-as-usual (BAU) projects this year.

## Resources

### **Financial resources**

This work plan is based on the assumption of a team of 19 Education Department employees and an overall budget of approximately £1,100,000. The work plan assumes that the HCPC is able to manage a maximum of 20 approval visits per month and monitoring relating to approximately 1000 approved programmes at any one time. Additionally, the work plan assumes that the visit schedule for social workers and AMHP programmes in England is relatively fixed. There is an underlying assumption that the HCPC approves pre-registration programmes in sixteen professions and post-registration entitlement programmes in five areas.

The Department budget of £1,100,000 is based on an estimated 85 approval visits, 9 annual monitoring assessment days, 40 annual monitoring assessments by correspondence and 87 major changes submissions. These predicted figures are based partly on the operational levels in the last few financial years and partly on the requirements related to social workers and approved mental health professionals and expectations around paramedics and operating department practitioners.

The budget for the 'Education Systems Build' project is managed separately, outside of the Education Department, as part of the organisation's project portfolio. The budget includes two seconded roles.

### **Human resources**

There are nineteen employees in the Education Department.

Director of Education  
PA to Director  
Head of Educational Development

#### Team 1

Education Manager  
Education Officer x 4  
Education Administrator

#### Team 2

Education Manager  
Education Officer x 4  
Education Administrator

#### Team 3

Education Manager  
Team Administrator

### Major project - secondments

Project lead - Education Manager

Senior User - Education Officer

During the last financial year (2013–14), the Department recruited two replacements comprising of one Education Officer and one Education Administrator. We also recruited to one new role (Education Officer). At the end of 2013–14, there were two vacancies (backfill) as a result of the secondments. Recruiting and retaining employees, in order to work effectively and proactively, will continue to be a focal point and challenge for the Department management in 2014–15 and thus will remain a risk for this financial year. This is captured in the HCPC's risk register.

### **Responsibilities**

The Director of Education is responsible for the overall management of the Department, the development and implementation of the strategy and work plan and the development of new projects. The Director of Education reports to the Chief Executive and sits on the executive management team.

The PA to the Director provides direct support to the Director of Education and Head of Educational Development.

The Head of Educational Development is responsible for the day to day management and leadership of the approvals and monitoring function as well as the development and enhancement of educational and communication initiatives with education providers and stakeholders. The Head of Educational Development reports to the Director of Education.

The Education Managers have management responsibility for the development and management of their team including work allocation, process planning and development. The operational process work is divided up on a regional basis and allocated to teams one and two. The Education Managers of these teams also play a key role in implementing new initiatives. The majority of the supporting activity work is allocated to team three. The Education Managers report to the Head of Educational Development.

The Education Officers implement and maintain the main operational processes and contribute to the delivery of the supporting activities and projects. This includes coordinating and attending approval visits, annual monitoring assessment days and education seminars. The Education Officers report to an Education Manager.

The Education Administrators provide support to their team across all their activities. This includes liaising with education providers and partners about approval visits and monitoring submissions, generating correspondence and maintaining information systems. The Education Administrators report to an Education Manager.



The Team Administrator provides support to the department across its supporting activity work as well as office and financial administration. This includes responding to all generic education requests for information and publications and the logging and tracking of all department invoices. The Team Administrator reports to an Education Manager.

The Education Manager on secondment is responsible for leading and managing the 'Education Systems Build' major project. They report to the Head of Educational Development, in their role as project sponsor.

The Education Officer on secondment is responsible for providing user experience, advice and guidance to the 'Education Systems Build' major project. They report to the Education Manager on secondment.

## Risk management

The Education Department manages those organisational risks that are primarily concerned with:

- Employees within the Education Department (issues such as turnover, skills development and managing performance); and
- Education providers (issues such as compliance with our processes, communication and support).

Activities outlined in this work plan also help mitigate organisation risks managed by other departments. Key areas include project management and the recruitment, training and on-going support of both employees and partners.

References to the risk register are integrated throughout this work plan in the relevant sections and a detailed extract is included in appendix 1. The table below provides a summary of the links between the HCPC's risk register and this work plan.

Risk		Significance (Jan 2014)	Probability (Sept 2013)
7.1	Failure to detect low education providers standards	Low	Low
Mitigations: Main operational processes; education providers' complaints process; supporting activities; projects; training of employees and partners.			
7.2	Education providers refusing visits or not submitting data	Low	Low
Mitigations: Legal powers (HPSWO 2001) and supporting activities (publications, website and seminars).			
7.3	Inability to conduct visits and monitoring tasks	Low	Low
Mitigations: Adequate resourcing and training; hire staff to backfill or clear backlogs of work; department growth; main operational processes; supporting activities (partner visitor recruitment, selection and training and committee) and major projects (Education & Partners)			
7.4	Loss of support from education providers	Low	Low
Mitigations: Main operational processes; supporting activities (publications, website, seminars, partner visitor recruitment, selection and training and liaison with stakeholders); and development work (service user involvement, prescribing standards, AMHP criteria).			
7.5	Education database failure	Low	Low
Mitigations: (Education Department only) Adequate resourcing and training; major project for longer term mitigation			
7.6	Loss or significant changes to funding, commissioning and placement opportunities for approved programmes	Low	Low
Mitigations: Main operational processes; supporting activities (partner visitor training and liaison with stakeholders), training of employees and partners			
6.2	Incorrect interpretation of law and/or SI's resulting in PSA review	Low	Low

Risk		Significance (Jan 2014)	Probability (Sept 2013)
Mitigations: (Education Department only) Supporting activities (publications, website and partner visitor recruitment, selection and training) and major project (Partners systems review)			
6.4	Partners poor performance	Low	Low
Mitigations: (Education Department only) Supporting activities (publications, website and partner visitor recruitment, selection and training) and major project (Partners systems review)			
6.5	Incorrect interpretation of HPSWO in use of Partners	Low	Low
Mitigations: (Education Department only) Operational processes; supporting activities (publications, website and partner visitor recruitment, selection and training) and major project (Partners systems review)			
6.6	Inability to recruit and/or retain suitable Partners	Low	Low
Mitigations: (Education Department only) Supporting activities (publications, website and partner visitor recruitment, selection and training) and major project (Partners systems review)			
6.7	User departments using non-active partners	Low	Low
Mitigations: (Education Department only) Operational processes; supporting activities (publications, website and partner visitor recruitment, selection and training) and major projects (Education and Partners)			
8.13	Failure to deliver a system & process review of the Education department	Low	Low
Mitigations: (Education Department only) Employee secondments; employee training and development; APDRs; hire staff to backfill or clear backlogs of work and major project (Education)			
11.1	Loss of key HCPC employees	Low	Low
Mitigations: (Education Department only) Employee training and development; APDRs; 121s; hire staff to backfill or clear backlogs of work and major project (Education)			
15.2	Unexpected rise in operating expenses	Low	Low
Mitigations: (Education Department only) Adequate resourcing and training; management information and monitoring; employee training and development; APDRs and 121s.			
15.3	Major Project Cost Over-runs	Low	Low
Mitigations: (Education Department only) Adequate resourcing and training; management information and monitoring; employee training and development; APDRs and 121s.			
17.2	Document & Paper record Data Security	Low	Low
Mitigations: (Education Department only) Employee training and development; Partner training; management monitoring; APDRs;121s and major project (Education)			
17.3	Major Project Cost Over-runs	Low	Low
Mitigations: (Education Department only) Employee training and development; Partner training; management monitoring; APDRs;121s and major project (Education)			

## Equality and diversity

The Education Department will continue to scrutinise and monitor all activities in this work plan with a view to identifying and where possible, mitigating any adverse impact to some groups, compared to others.

In 2013–14, the Department accomplished the following action points as part of the wider organisation's Equality and Diversity Scheme;

- We published and reviewed a number of publications (with the Communications Department).
- We changed the format and content of the Education Update publication to improve accessibility and clarity (with the Communications Department).
- We trained a number of new visitors in equality and diversity (with the Partners Department).
- We organised a number of education seminars in venues with access for people with disabilities and identified and accommodated any additional needs highlighted at an early stage.
- We considered equality and diversity implications and build these into the discovery and build phases of the major project.
- We updated the on-line searchable list of approved programmes (with the Communications Department) for independent and supplementary prescribing programmes.

During 2014–15, the Department will continue to aim to improve accessibility to their work and ensure that they take into account any issues that could have an adverse impact and mitigate against this. This work will primarily be undertaken as part of the major project.

## Information security

The Education Department will continue to scrutinise and review all activities in this work plan in line with the wider organisation's preparations for the adoption of ISO27001 (information security). We intend to identify and where possible, mitigate any key information security risks.

In 2013–14, the Department accomplished the following points as part of the wider organisation's commitment to creating an information security management system;

- We trained a number of new employees in information security issues (with the Business Process Improvement Department).
- We trained a number of visitors in information security issues (with the Business Process Improvement and Partners Departments).
- We continued to promote our expectations around electronic and on-line submission and storage above paper based documents (therefore reducing the associated risks with storage and transfer).
- We considered information security implications and build these into the discovery and build phases of the major project.
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During 2014–15, the Department will continue to identify and where possible, mitigate any key information security risks, primarily as part of the major project.

## Main operational processes

There are four main processes which generate the bulk of the Department's work and are the top priorities. The following paragraphs summarise these activities.

### **Approval process**

The approval of programmes will continue to be the crux of the Department's work. In 2014–15, we are planning to undertake approximately 85 visits. The number of visits is higher than the last three financial years and linked to the number of social worker and AMHP programmes in England requiring a visit. We anticipate social worker and AMHP programmes in England accounting for approximately 54% of the total number of visits across the year. There will be high concentrations of approval visits to these programmes in quarters one and four of this financial year.

Due to the overlap of academic and financial years, the Department will also engage in significant pre visit planning in quarters three and four for visits that will take place in quarter one of the next financial year (2015–16).

As with previous years, it is likely that the peak months for visits will be April - June 2014 and February - March 2015 as the majority of approval visits are concurrent with education providers' internal events which take place at these times.

We intend to review and reflect on our experiences of new profession and entitlements engaging with on our approval process for the first time. This will include analysis of the second year of visits to social workers programmes, the first year of visits to AMHP programmes and the approval of independent prescribing programmes for the first time in 2013-14.

During this year, the Department will ensure that the approval process remains fit for purpose, by addressing any urgent feedback or shortcomings. The internal operating process will continued to be reviewed in its entirety as part of the major project.

### **Annual monitoring process**

The annual monitoring process will complete its ninth cycle and begin its tenth cycle in 2014–15. In 2014–15, we expect to put over 600 approved programmes through this process. This is an increase from recent years and linked to the number of practitioner psychologist, hearing aid dispenser and social worker programmes now subject to annual monitoring.

The ninth cycle of the process, which began in January 2014, is the third cycle to assess practitioner psychologist programmes and the second cycle to assess hearing aid dispenser programmes. Once this cycle is complete, all practitioner psychologist and hearing aid dispenser programmes will have gone through the annual monitoring process

The tenth cycle of the process, which will begin in January 2015, will see a further increase in numbers as the first group of social worker programmes join annual monitoring. These programmes would have been visited by the HCPC in the 2012–13 academic year (2012–13 and 2013–14 financial years).

As with previous years, it is likely that the peak months for annual monitoring activity will be April - August 2014 and January - March 2015, as this is when most education providers' internal monitoring processes are complete, so they are ready to submit documentation to us.

We plan to hold nine annual monitoring assessment days to consider the majority of audit submissions. This is an increase of one on the last financial year. We intend to hold three assessment days in April 2014; two assessment days in June 2014; two assessment days in February 2015 and two assessment days in March 2015.

Approximately 40 annual monitoring submissions will be considered by correspondence to ensure a timely turnaround. . This number is consistent with the last financial year as we intend to use assessment days to consider the majority of programmes.

Due to the overlap of academic and financial years, the Department will undertake a substantial planning process in quarter two of this year (2014–15), ahead of the 2014–15 academic year.

We intend to review and reflect on our experiences of new profession and entitlements engaging with on our annual monitoring process for the first time. This will include continued analysis of both practitioner psychologists and hearing aid dispenser programmes.

During this year, the Department will ensure that the annual monitoring process remains fit for purpose, by addressing any urgent feedback or shortcomings. The internal operating process will continue to be reviewed in its entirety as part of the major project. .

### **Major change process**

The major change process will begin its sixth cycle in the 2014–15 financial year. The 'notification stage', which means that not all submissions continue through to the full major change process, continues to filter out submissions into either the annual monitoring or approval process at the earlier opportunity, if applicable. Approximately 35% of submissions are filtered out at the notification stage.

We anticipate the numbers going through the process being consistent with the last financial year. In 2014–15, we expect to put approximately 90 submissions through the full major change process. An additional 20 submissions will be filtered out at the initial notification stage and will therefore only involve executive resource.

The major change workload continues to be difficult to predict in terms of peaks and troughs. It is expected to be fairly consistent throughout the year with a slight increase between April – June 2014 as education providers make changes ahead of the 2014–15 academic year.

We intend to review and refresh our communications on the major change process this year. This has been packaged as a business as usual project and more detail can be found later on in this work plan document.

During this year, the Department will ensure that the major change process remains fit for purpose, by addressing any urgent feedback or shortcomings. The internal operating process will continue to be reviewed in its entirety as part of the major project.

### **Education provider concerns process**

The education provider concerns process will complete its fifth cycle and begin its sixth cycle in the 2014–15 financial year. In 2014–15, we expect to put approximately four complaints through the full education provider complaints process. It is likely that we will deal with a further 10 enquiries. These numbers are consistent with the last financial year.

The complaints workload is expected to be fairly consistent throughout the year with a slight increase between June – October 2014 as this when the majority of assessment related decisions are made by education providers.

We intend to raise the profile of our concerns process, via a range of communications initiatives, to help develop a better awareness and understanding of it.

During this year, the Department will ensure that the education provider concerns process remains fit for purpose, by addressing any urgent feedback or shortcomings. The process will continue to be reviewed in its entirety as part of the major project. This review is focusing on the back office/implementation of the process and will not alter the principles or policy of the process.



## Supporting activities

There are seven activities which support the main operational processes. These activities aim to raise awareness of our processes amongst key education stakeholders and help promote an open, transparent and collaborative approach to approval, monitoring and raising concerns.

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

### **Publications**

In 2014–15, the Department intend to carry out limited work on the suite of education specific publications, as the majority were revised in the 2012-13 financial year and remain fit for purpose.

The Department will review and revise the ‘Major change – supplementary information for education providers’ publication in this financial year. . This is part of a wider communications initiative and has been packaged as a business as usual project. More detail can be found later on in this work plan document.

The Department will continue to produce and publicise their annual reports. The eighth annual report, covering the 2012-13 academic year, is due to be published in quarter one of the financial year. It is anticipated that the ninth annual report, covering the 2013-14 academic year, will be drafted during quarters three and four of the financial year.

The Department intend to work with the Policy and Standards Department to produce, review and publicise a number of new and updated publications including ‘A disabled person's guide to becoming a health professional’ and the standards of proficiency.

### **Website**

The Department is responsible for the online register of approved programmes as well as the online information about our processes and communication work.

In 2014–15, the Department will undertake a full review and update of the education sections of the website (including the education provider section on the home page). Specific updates will be made around service user and carer involvement in education and training, the standards of proficiency and the major change process.

The Department will also engage with a series of web upgrades and enhancements as part of a major project (web deployments).

## **Seminars**

The Department is responsible for designing and delivering a series of regional events for education providers. These include presentations as well as more interactive and facilitative sessions.

In 2014–15, the Department intend to run eight seminars in total. This is consistent with last year.

The Department intend to run two seminars for social worker education providers in autumn 2014. These will follow a similar format to those delivered in autumn 2013 and will focus on the approvals process. We will specifically target those social worker and AMHP education providers due to undergo an approval visit in the 2014–15 academic year. This will be the last time the Department run these profession specific seminars for social work and AMHP programmes.

The Department intend to run six seminars for all its professions. These will follow a similar format to those delivered in autumn/winter 2014 and will focus on service user and carer involvement in education and training.

## **Partner visitor recruitment, selection and training**

The Department is responsible, along with the Partners Department, for ensuring that we have an appropriate quantity and quality of trained visitors to deliver our operational processes.

In 2014–15, the focus of partner activity will be split evenly between recruitment and training.

The overall workload will be significantly more than the last financial year as we will be recruiting to the revised lay visitor role for the first time. This follows the decision of the Education and Training Committee in June 2013 to include lay visitors on all approval panels from September 2014 onwards. The Department aims to recruit and train 15 lay visitors in April-July 2014.

The remaining recruitment activity in 2014–15 will focus on maintaining appropriate numbers for all of our professions and entitlements. This will be impacted by a large number (60%) of visitor agreements due to expire this year. It is envisaged that the Department will need to recruit approximately fifteen replacement visitors from across the entire pool. This recruitment is likely to take place September – November 2014.

The training activity in 2014–15 will include both refresher training for existing visitors and new visitor training. It is anticipated that there will be four refresher visitor training sessions this year (an increase of 25% on last year), reaching approximately 50% of visitors (i.e. 90 individuals). There is likely to two new visitor training sessions this year. One session will be for the fifteen replacement visitors which is likely to take place February 2015. The other will be to train up to 15 new lay visitors and is likely to be held in July 2014.

In addition to the above supporting activities, the Department will also continue to engage in a full scale process and system review of the Partners Department in 2014–15, as part of the partners' major project.

### **Information systems (database and electronic records)**

The Department is responsible for maintaining a number of information systems and interfaces (e.g. education database, netregulate, shared drive).

In 2014–15, the Department intend to carry out minimal work on the existing systems, as they are all due to be revised as part of the major project.

### **Committee work**

In 2014–15, the Department will continue to support the Education & Training Committee, particularly in light of the recent restructure of the Council and Committees. The Department will continue to contribute to discussions on the Committee's intentions for wider stakeholder engagement.

The Department will continue to work with the Secretariat Department on the training and strategy sessions for Education and Training Committee and its Panels. We will also continue to monitor the operating effectiveness of the Education and Training Panels.

### **Liaison with stakeholders**

In 2014–15, the Department will continue to work with stakeholders (e.g. general public, professional bodies, partners and educational bodies) in the broad area of education. We will balance our commitment to engaging with new social work stakeholders (e.g. employers, educators, professional bodies, commissioning and funding organisations) alongside those associated with other professions and educational establishments

The Department will continue to publish Education Update (our electronic newsletter directed at all of our stakeholders). It is circulated three times a year to approximately 1000 contacts, and also available on-line. The Department will monitor the effectiveness of this publication given the revisions to the format which were made in 2013-14.

The Department will continue to the Communications Department to raise the profile of education with registrants, the public and external stakeholders. It is envisaged that we will continue to produce content and highlight opportunities for inclusion in HCPC In-Focus, social media, HCPC blog, online news articles and press releases.

The Department will continue to participate in inter-regulatory forums and meetings with bodies such as Quality Assurance Agency and the Council of Deans. There are a plethora of forums and with finite resources we will continue to prioritise our attendance based on the relevancy of agendas and competing priorities.

The Department will continue to work with internal stakeholders to raise the profile of education and its connectivity with other departments. The Department will continue to meet regularly with the Registrations Department to ensure the interfaces between programme approval and registration are unified. The Department will also engage in a new major project that intends to review the processes and systems used in the registration process.

## Development work

Over the last few years, the Department has spent an increasing proportion of its time and resources working in new and expanding areas. This is now captured in the Department's work plan. All of the development work relates to our changing and extending role in professional regulation.

In 2014–15 it is anticipated that our developmental work will focus primarily on changes associated with current professions rather than the new professions or groups. It is also likely that most of the changes will be internally driven. However, it is also the area of work which is most likely to be affected by external factors, so we will remain flexible. For the majority of work in this area, the Department will continue to work collaboratively with the Policy and Standards Department.

The following lists summarises some anticipated areas of development;

### **Current professions**

- Standards of proficiency review (on-going / final seven professions);
- Standards of conduct, performance and ethics (on-going);
- Standards of education and training, and its guidance;
- ;
- 
- SET 1 (level of qualification for entry to the Register);
- Student fitness to practice;
- Language testing; and
- Law Commission review of health and social care professional regulation.

### **New professions or groups**

- Practitioners of herbal medicine (medical herbalists and traditional Chinese medicine practitioners);
- Public health specialists;
- Annotation of qualifications in podiatric surgery; and
- Adult social care workforce in England.

## Projects

The work plan uses the organisational wide terminology when categorising project work. There are three broad categories;

**Major projects** are those that use large amounts of resources, have a high risk or significant consequences.

**Small projects** are those that use small amounts of resources, involve minor changes to business processes, focus around a distinct body of work and normally affect more than one internal department.

**Business-as-usual projects** are those that use minimal amounts of resources, involve minor changes to business processes, focus around a distinct body of work and normally affect just one internal department.

### **Major projects**

In 2014–15, it is anticipated that the majority of the Department's project work will be through major projects. This will be the fourth year where the majority of the Department's project work will be in major projects.

The Department will continue to lead the 'Education Systems Build' major project in 2014–15. This project is pivotal to the future running and management of the Department. It will run for the majority of the year and has two employees seconded to work on it full-time. It is important that this project is progressed, both on time and on budget. Consequently, priority will be given to this project compared to all other projects.

In addition, the Department will have varying levels of involvement in a number of other major projects. The actual initiation and priority of these major projects will be determined by the Executive Management Team. It is anticipated that members of the Department will contribute to and be part of the project team for the following major projects:

- HR & Partner systems review (on-going from 2013–14);
- Web deployments (on-going from 2013–14);
- Netregulate changes (on-going from 2013–14);
- Professional indemnity insurance (on-going from 2013–14);
- HR & Partner systems build;
- Fees review;
- Registration process and system review; and
- Finance process and system review.

### **Small projects**

In 2014–15, it is not anticipated that the Department will undertake any small projects.

## **Business-as-usual projects**

In 2014–15, there are four business-as-usual projects in the work plan. This is consistent with last year and reflects the priority given to operational processes and major projects.

Most of the business-as-usual (BAU) projects have evolved out of operational or developmental work in previous years. All of them aim to enhance our work at an operational level by providing information and clarity for key stakeholders. Whilst it is important that these BAU projects are completed, there is less of an urgency to complete them in a specific time period. Consequently, all of these projects will be scheduled for implementation in the quieter periods of 2014–15. A number of these projects are on-going from last year (2013–14). If resources become stretched at any point, then we will revisit the viability of running these BAU projects to the proposed timescales.

The following lists summarises the anticipated BAU projects;

- 1) Service user and carer involvement standard
  - On-going communications work to prepare education providers, stakeholders, visitors and executive for the staged implementation of this new standard.
  - Review and enhance online information
  - Re-run of seminars
  - On-going from 2013–14
  - High priority
- 2) Major change review
  - Review all communications initiatives related to the process to encourage a better understanding of the process amongst education providers, especially those from new professions
  - Review of the format, content and audience of the major change publication. Review to align itself with the Communications strategy and Communications Department work on e-communications.
  - Review website usage and information on the process
  - Medium priority
- 3) Social work (Year 2) and AMHP (Year 1) approval visits review
  - Review of approval process and identification of trends emerging for the new professions/extended areas of practice.
  - Medium priority
- 4) Lay visitors on approval visit panels
  - On-going work to prepare education providers, stakeholders, visitors and executive for the implementation of lay visitors on approval visits panels from September 2014 onwards.
  - Involves recruitment and training of lay visitors.
  - Review of implementation.
  - Medium priority

- 5) Partnerships with professional and system regulators
- Review current stakeholder relationships with regulators within the health, care and education sectors, with a view to establishing memorandums of understanding / agreements that focus on mitigating shared risks within common academic and placement setting. Organisations such as the Quality Assurance Agency, Ofsted, Care Quality Commission, Local Government Association, Teaching Training Agency, Office of the Independent Adjudicator and the Higher Education Better Regulation Review Group could be included.
  - On-going from 2013–14
  - Low priority



## 2013 – 14

### Update on the 2013–14 work plan

The following table summarises the progress in achieving the key areas included in the 2013–14 work plan. As anticipated, the Department had to adopt a flexible approach to the delivery of last year's work plan in order to respond accordingly to internal and external factors.

Area of work	Start Date	End Date	Progress report (12 March 2014)
<b>Operational processes</b>			
Approval process	April 2013	March 2014	Estimated 71 approval visits in 2013-14 Actual number = 70 (-1% variance)
Annual monitoring process	April 2013	March 2014	Estimated 8 assessment days in 2013-14 Actual number = 10 (+25% variance) Estimated 30 assessments by post in 2013-14 Actual number = 26 (-13% variance)
Major change process	April 2013	March 2014	Estimated 110 notifications in 2013-14 Estimated* number of notifications = 128 (+16% variance) (* = estimated for month of March 2014) Estimated 90 submissions in 2013-14 Estimated* number of submissions = 94 (=4% variance) (* = estimated for month of March 2014)
Concerns process	April 2013	March 2014	Estimated 8 concerns in 2013-14 Actual number = 5 (-38% variance)
Care Councils Memorandum of understanding	Oct 2013	March 2014	Complete <ul style="list-style-type: none"> <li>Six monthly meetings held with education leads</li> </ul>
<b>Supporting activities</b>			
Annual report 2012	April 2013	May 2013	Complete <ul style="list-style-type: none"> <li>Published and circulated in May 2013</li> </ul>
Annual report 2013	Oct 2013	March 2014	On-going in 2014-15 <ul style="list-style-type: none"> <li>Content drafted and analysed</li> </ul>

Area of work	Start Date	End Date	Progress report (12 March 2014)
			<p>between September 2013 – January 2014</p> <ul style="list-style-type: none"> <li>• Draft report to Education &amp; Training Committee in March 2014</li> <li>• Publication to be published and disseminated in quarter 1 of 2014-15</li> </ul>
Approval criteria for AMHP	April 2013	Oct 2013	<p>Complete</p> <ul style="list-style-type: none"> <li>• Mailed out to education providers in summer 2013</li> </ul>
Standards for prescribing	April 2013	Oct 2013	<p>Complete</p> <ul style="list-style-type: none"> <li>• Mailed out to education providers in summer 2013</li> </ul>
Standards of proficiency (revised)	April 2013	March 2014	<p>On-going in 2014-15</p> <ul style="list-style-type: none"> <li>• Mailed out to education providers in second half of 2013-14</li> </ul>
A disabled person's guide	April 2013	March 2014	<p>On hold</p> <ul style="list-style-type: none"> <li>• Awaiting research outcomes from Policy &amp; Standards work</li> </ul>
Website review and maintenance	April 2013	March 2014	<p>Complete</p> <ul style="list-style-type: none"> <li>• Monitored usage of education specific pages</li> <li>• New information for prescribing in August 2013</li> <li>• New information for AMHPs in August 2013</li> <li>• New information on the revisions to the standards of proficiency in second half of 2013-14</li> <li>• Seminar resources uploaded in February 2014</li> <li>• Migration of some historic programmes into the searchable list.</li> </ul>
Education seminars	April 2013	Feb 2014	<p>Complete</p> <ul style="list-style-type: none"> <li>• 8 seminars held in second half of 2013-14</li> <li>• 2 social work seminars</li> <li>• 6 service user and carer seminars</li> <li>• Seminar feedback report to be taken to ETC in March 2014</li> </ul>
Visitor recruitment & selection (existing professions)	Oct 2013	Dec 2014	<p>Complete</p> <ul style="list-style-type: none"> <li>• 7 visitors (AT, BS, RA (therapeutic) &amp; HAD) were recruited in second half of 2013-14</li> </ul>

Area of work	Start Date	End Date	Progress report (12 March 2014)
			(1 AT/2 BS/3 RA/ 1 HAD) <ul style="list-style-type: none"> <li>• Vacancies in CH, DT &amp; PO carried over to 2014-15</li> </ul>
Visitor recruitment & selection (lay visitors)	Jan 2014	March 2014	On-going in 2014-15) <ul style="list-style-type: none"> <li>• Recruitment commenced in January 2014 with appointments anticipated in June 2014</li> </ul>
Visitor training ( existing professions)	Jan 2014	March 2014	Complete <ul style="list-style-type: none"> <li>• 1 session in Feb 2014</li> <li>• 8 visitors attended training sessions in Feb 2014</li> <li>• No new visitors currently untrained</li> <li>• Existing visitors (PA/CH/PH/RA) who were eligible to act as IP visitors received supplementary training (by correspondence)</li> <li>• 6 social worker visitors who were able to act as AMHP visitors received supplementary training (by correspondence)</li> </ul>
Visitor training (lay visitors)	Jan 2014	March 2014	Deferred to 2014-15 <ul style="list-style-type: none"> <li>• To be delivered in summer 2014</li> </ul>
Visitor training (refresher)	Sept 2013	Dec 2014	Complete <ul style="list-style-type: none"> <li>• 3 sessions in Oct , Nov &amp; Dec 2013</li> <li>• 67 visitors attended training sessions in Oct, Nov &amp; Dec 2013</li> <li>• 27 visitors still require training (i.e. were trained more than two years ago now) – carried over to 2014-15</li> </ul>
Visitor reappointments process	April 2013	March 2014	Complete
Visitors - long term succession planning	Oct 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• Regular analysis of visitor engagement with available work</li> <li>• Regular monitoring of resignations and inactive visitors</li> </ul>
Education & Training Committee & Panel (support & training)	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• New council induction held in January 2014</li> <li>• Panel training held on 6 March 2014</li> <li>• Management information and Director's report revised following</li> </ul>

Area of work	Start Date	End Date	Progress report (12 March 2014)
			Council restructure
Education update	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• Three editions circulated in May 2013, October 2013 and Jan 2014</li> </ul>
HCPC organisation wide communications <ul style="list-style-type: none"> <li>– HCPC In-Focus</li> <li>– Online news articles / press releases</li> <li>– Social media</li> </ul>	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• HCPC In-Focus articles on the annual report 2012; service user and carer involvement in education and training and education seminars.</li> <li>• Online news articles / press releases around prescribing standards, AMHP criteria and review of year one of social worker approval visits.</li> <li>• Social media activity around seminars and social worker approval visits</li> <li>• Blog posts on annual report 2012; review of practitioner psychologist programme approvals; review of year one of social worker approval visits and service user and carer involvement in education and training.</li> </ul>
Stakeholder meetings	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• Regular meetings and presentations with education stakeholders</li> </ul>
<b>Development work (current professions)</b>			
Standards of proficiency (profession specific phase)	April 2013	March 2014	On-going in 2014-15 <ul style="list-style-type: none"> <li>• Communications focus to work in first half of 2013-14 (via Education update)</li> <li>• Increased operational focus to work in second half of 2013-14</li> </ul>
Standards of conduct, performance and ethics	April 2013	March 2014	On hold <ul style="list-style-type: none"> <li>• Awaiting research outcomes from Policy and Standards work before engaging in any development work in this area</li> </ul>
Extension and changes of prescribing rights	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• Communications focus to work in first half of 2013-14</li> <li>• 2 assessment days held in</li> </ul>

Area of work	Start Date	End Date	Progress report (12 March 2014)
			November 2014 <ul style="list-style-type: none"> <li>• 100 programmes approved</li> <li>• Postal assessment process developed for future use</li> </ul>
Service user involvement in education and training	July 2013	March 2014	On-going in 2014-15 <ul style="list-style-type: none"> <li>• Communications focus in 2013-14 through seminars, blog piece and Education update.</li> </ul>
Lay visitors	April 2013	March 2014	On-going in 2014-15 <ul style="list-style-type: none"> <li>• Lay visitor role brief agreed</li> <li>• Communicated outcome through Education update</li> <li>• Recruitment opened in Jan 2014</li> </ul>
Changes to post registration LA & POM entitlements	April 2013	March 2014	Deferred to 2015-16
SET 1 (level of qualification for entry to the Register)	April 2013	March 2014	On hold (on-going in 2014-15) <ul style="list-style-type: none"> <li>• Awaiting completion of revised standards of proficiency in specific professions before engaging in any development work in this area</li> </ul>
Student fitness to practice	April 2013	March 2014	On-going in 2014-15 <ul style="list-style-type: none"> <li>• Social work suitability scheme</li> </ul>
Language testing	April 2013	March 2014	On hold (on-going in 2014-15) <ul style="list-style-type: none"> <li>• Awaiting legislation/government policy before engaging in any development work in this area</li> </ul>
Law Commission research	April 2013	March 2014	Deferred to 2014-15 <ul style="list-style-type: none"> <li>• Awaiting legislation/government policy before engaging in any development work in this area</li> </ul>
<b>Development work (new professions)</b>			
Practitioners of herbal medicine (medical herbalists and traditional Chinese medicine practitioners)	April 2013	March 2014	Deferred to 2014-15 <ul style="list-style-type: none"> <li>• Awaiting legislation/government policy before engaging in any development work in this area</li> </ul>
Public health specialists	April 2013	March 2014	Deferred to 2014-15 <ul style="list-style-type: none"> <li>• Awaiting legislation/government policy before engaging in any development work in this area</li> </ul>
Annotation of qualifications in podiatric	April 2013	March 2014	Deferred to 2014-15 <ul style="list-style-type: none"> <li>• Awaiting initial work from Policy</li> </ul>

Area of work	Start Date	End Date	Progress report (12 March 2014)
surgery			and Standards Department before engaging in any development work in this area
Adult social care workforce in England	April 2013	March 2014	Deferred to 2014-15 <ul style="list-style-type: none"> <li>Awaiting legislation/government policy before engaging in any development work in this area</li> </ul>
<b>Projects (major projects)</b>			
Education system build	April 2013	March 2014	On-going in 2014-15
HR & Partner systems and process review	April 2013	March 2014	On-going in 2014-15 <ul style="list-style-type: none"> <li>Limited involvement for Education Department</li> </ul>
Annotation to the Register	April 2013	Dec 2013	Complete <ul style="list-style-type: none"> <li>Changes made to netregulate to enable SP/IP annotations</li> </ul>
Web deployment	April 2013	Dec 2013	Complete <ul style="list-style-type: none"> <li>Changes made to the register of approved programmes</li> </ul>
NetRegulate changes 2013-14	April 2013	Dec 2013	Complete
Professional Indemnity insurance	April 2013	Dec 2013	On-going in 2014-15 <ul style="list-style-type: none"> <li>Initial advice communicated to education providers via Education update in May 2013 and Jan 2014</li> </ul>
HR & Partner systems build			Deferred to 2014-15
Web platform review			Deferred to 2014-15
Fees review			On-going in 2014-15 <ul style="list-style-type: none"> <li>Limited involvement for Education Department (communications to students/new registrants)</li> </ul>
Registration process and system review (Phase 1)	April 2013	March 2014	Deferred to 2014-15
Finance process and system review (Phase 1)	Oct 2013	March 2014	Deferred to 2014-15
<b>Projects (business-as-usual projects)</b>			
Watch list clarification	April 2013	March 2014	Deferred to 2014-15
Education provider feedback	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>Report taken to ETC in June 2013</li> </ul>

Area of work	Start Date	End Date	Progress report (12 March 2014)
Education Update review	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• New design, format and features</li> <li>• Enhanced internal publication process</li> <li>• Changes implemented in January 2014</li> </ul>
Partnership with professional and system regulators	April 2013	March 2014	On-going in 2014-15 <ul style="list-style-type: none"> <li>• Initial meeting with stakeholders</li> </ul>
AMHP module/unit clarification	April 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• Communicated HCPC remit and register of approved programmes to local authorities and education providers.</li> <li>• Facilitated the approval of additional named awards via the approvals process</li> </ul>
Review of year one of social worker approval visits	Oct 2013	March 2014	Complete <ul style="list-style-type: none"> <li>• Report taken to ETC in November 2013</li> <li>• Integrated into annual report 2013</li> </ul>

## 2015 – 16

It is likely that 2015–16 will be a year, similar to this year, where the Department's work will continue to be shaped greatly by the impact of regulating new professions and entitlements. The operational activities will continue to focus and be skewed heavily by social workers and AHMPs in England; however we will see the beginning of a shift in engagement from approvals visits to our on-going monitoring processes.

The operational activities are also likely to continue to focus on assessing changes to existing programmes in relation to our revised standards of proficiency and new requirements for service user and carer involvement in education and training. We will also continue to embed the work of lay visitors into our approval and monitoring processes.

Internally, the Department's work will be shaped greatly by the outcomes of the 'Education Systems Build' major project. The Department anticipates working with a new information system and under a different structure.

Additionally, we will work with the Policy and Standards Department around the review of the standards of conduct, performance and ethics and its related guidance on conduct and ethics for students, and work to review the standards of education and training and its guidance.



## Appendix 1 - Risk register extracts

R	Category	Ref	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Impact before mitigations Jan 2014	Likelihood before mitigations Jan 2014	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	RISK score after Mitigation Jan 2014	RISK score after Mitigation Sept 2013
7	Education	7.1	Failure to detect low education providers standards	Director of Education	4	2	8	Operational processes (approval, monitoring and complaints about an approved programme)	Regular training of employees and visitors	Memorandums of understandings with other regulators (e.g. CQC and Care Councils)	Low	Low
		7.2	Education providers refusing visits or not submitting data	Director of Education	3	2	6	Legal powers (HSWPO 2001)	Delivery of Education Dpt supporting activities as documented in regular work plan	-	Low	Low
		7.3	Inability to conduct visits and monitoring tasks	Director of Education	4	2	8	Adequate resourcing, training and visit scheduling	Approvals & monitoring processes	Temporary staff hire to backfill or clear work backlogs	Low	Low
		7.4	Loss of support from Education Providers	Chief Executive or Director of Education	5	2	10	Delivery of Education strategy as documented in regular work plan	Partnerships with Visitors and professional groups.	Publications, Newsletters, website content, inclusion in consultations and relevant PLGs, consultations with education providers	Low	Low
		7.6	Loss or significant change to funding, commissioning and placement opportunities for approved programmes	Director of Education	3	2	6	Operational processes (approval, monitoring and complaints about an approved programme)	Partnerships with Visitors and professional groups.	Regular training of employees and visitors	Low	Low

	Partners	6.2	Incorrect interpretation of law and/or SI's resulting in PSAHSE review	Director of FTP, Director of Education, Head of Registration, Partner Manager	2	4	8	Training	Legal Advice	Regular appraisal system	Low	Low
	Partners	6.4	Partners poor performance	Director of FTP, Director of Education, Head of Registration, Partner Manager	4	3	12	Regular training	Regular appraisal system	Partner Complaints Process & Partner Code of Conduct	Low	Low
	Partners	6.5	Incorrect interpretation of HSWPO in use of Partners	Director of FTP, Director of Education, Head of Registration, Partner Manager	3	2	6	Correct selection process and use of qualified partners	Daily Email notification of partner registrant lapse	-	Low	Low
	Partners	6.6	Adequate number and type of partner roles	Partner Manager, Director of FTP, Director of Education, Head of Registration	3	2	6	Regular review of availability of existing pool of partners to ensure requirements are met.	Annual forecasting of future partner requirements to ensure that they are budgetted for.	Staggered partner agreements across professions for Panel Member and Panel Chair to ensure adequate supply in line with the eight year rule.	Low	Low
	Partners	6.7	User departments using non-active partners	Partner Manager, Director of FTP, Director of Education, Head of Registration	3	3	9	Notification of partner resignations to user departments.	Current partner lists available to user departments on shared drive.	-	Low	Low

	Finance	15.2	Unexpected rise in operating expenses	EMT	3	1	3	Budget holder accountability for setting budgets and managing them. Timely monthly reporting and regular budget holder reviews held. Finance & Resources Committee review of the monthly variances year to date.	Six month reforecasts with spending plan revisions as feasible and appropriate.	Legal cost insurance for FTP cases. Capped FTP legal case costs.	Low	Low
	Finance	15.3	Major Project Cost Over-runs	Project Lead / EMT	4	2	8	Effective project specification including creating decision points. Effective project management and timely project progress reporting (financial and non financial).	Creation of a project capex contingency budget. Project exception reports including revised funding proposal is presented to EMT for approval.	Finance & Resources Committee review of the project spending variances to date	Low	Low

	Information Security	17.2	Document & Paper record Data Security	EMT; Head of Business Improvement	5	3	15	Use of locked document destruction bins in each dept. Use of shredder machines for confidential record destruction in some depts e.g. Finance.	Data Protection agreements signed by the relevant suppliers. Dept files stored onsite in locked cabinets. Training where appropriate (Employees & Partners)	Regarding Reg Appln forms processing, employment contract includes Data Protection Agreement	Low	Low
	Information Security	17.3	Loss of electronic data	EMT, Director of IT and Director of Operations	5	3	15	Access is restricted to only the data that is necessary for the performance of the services.	Effective system processes including secure data transfer and remote access granted only on application and through secure methods. Training where appropriate Employees & (Partners)	Data Processor agreements signed by the relevant suppliers.	Low	Low