
Social Work Risk Register

Executive Summary

The Social Worker Risk Register (SWRR) and Risk Treatment plan is a document reflecting current and recent levels of risk recognised by risk owners, related to the project to migrate Social Workers in England to a new regulator, Social Work England.

This Social Worker Risk Register and Risk Treatment plan is continually under review. Residual risk is implicitly accepted for any current risk register unless otherwise indicated. Changes up to the end of August 2019 have been included.

Previous consideration	The SWRR is considered by the Committee at each of its meetings. It is considered by the project board regularly.
Decision	The Committee is asked to discuss the SWRR.
Next steps	The next iteration of the SWRR will be considered by the Committee at its November 2019 meeting.
Strategic priority	Strategic priority 3: Ensure the organisation is fit for the future and able to anticipate and adapt to changes in the external environment
Risk	Strategic risk 2 - Failure to anticipate and respond to changes in the external environment Strategic risk 3 - Failure to be a trusted regulator and meet stakeholder expectations
Financial and resource implications	None as a result of this paper.
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Risk Register & Risk Treatment Plan Social Workers in England

Marc Seale, Chief Executive & Registrar

Report to Audit Committee, (September 2019)



THE HEALTH AND CARE PROFESSIONS COUNCIL

ASSESSMENT

Historic Risk Scores

"Top Risks" (High & Medium after mitigation)

ID	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Mitigation I	Mitigation II	Mitigation III	CURRENT RISK SCORE	Feb-19	Nov-18	Sep-18	Jun-18	Mar-18	Nov-17	Sep-17	Apr-17		
S.15.1	Lost contribution caused by transfer of SW in England from HCPC to SW (England)	Finance Director	Medium term financial plan updated and reviewed as more detail of government's plans become available	Annual budget setting process and 6 and 9 month reforecast processes enable short term reductions in controllable costs	Break clauses in leases and other measures to minimise fixed costs; propose fee increase if necessary to cover balance of lost contribution	High	High	High	High	High	High	High	High	High		
S.8.1	Time Quality That communication around the content of the legislation is not forthcoming, leading to a lack of ability for HCPC to sufficiently prepare in time for the transfer	Government / DfE: Project Sponsor Project Lead	Early and frequent communication with D of E Project Team / Government departments to ensure that timeframes allocated to the transfer are adequate			High	High	High	High	High	High	High	High	High		
S.8.4	Time Quality That expectations around case progression, registrant application processing and course approval at the point of transfer are unrealistic given the timeframe assigned to the transfer process	Project Lead	Early expectation setting with the receiving organisation to manage a smooth transferal process			High	High	High	High	High	High	High	High	High		
S.1.3	Government's ambitious timetable leads to project failure.	HCPC Chief Executive & SMT	Draft SW England key assumptions document, v1.0 16th May 2018	On going regular contact with Gvmt depts	Chair to write to Secs of State asking for further clarification	High	High	High	High	High	High	High	High	Medium		
S.1.4	Brexit reduces availability of governments legal advice to New Reg	HCPC Chief Executive / SMT	On going regular contact with Gvmt depts			High	High	High	High	High	High	High	High	Medium		
S.1.7	Lack of Parliamentary time impacts delivery of project requirements	HCPC Chief Executive & EMT	On going regular contact with Gvmt depts	Delay project if required by government departments		High	High	High	High	High	High	High	High	New		
S.15.6	Funding shortfall for transfer project (pre-transfer)	Finance Director	Medium term financial plan updated and reviewed as more detail of government's plans becomes available	Annual budget setting process and 6 and 9 month reforecast processes enable short term reductions in controllable costs	Break clauses in leases and other measures to minimise fixed costs; propose fee increase if necessary to cover balance of lost contribution	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.2.1	Operational costs increased due to loss of volume discounts and scalability opportunities	SMT	Changes to supplier contracts	Fee rise to maintain service levels		Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.2.2	Changes to timetable for profession migration disrupt resource planned around specific date	SMT	Delay non time critical work to deliver Social Worker England project	Increase contractor resource		Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.5.1	New Regulator fails to deliver to timetable and our operations and performance are compromised (as awaiting transfer out of SW records)	Exec Director of IT & Resources, Project Portfolio Mgr	Share HCPC's migration expertise with new Regulator project team			Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.6.1	Loss of Registrants results in shortfall of SW Partners for existing or ongoing FTP cases, post transfer	Director of HR & Org Dev, Partner Mgr, Head of FTP	Outsource existing / ongoing SW cases to service provider post transfer	D of E funding of service provider	Outsourced contractors SLA	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.7.2	Timing of HCPC's planned disengagement with approvals and monitoring of SW programmes disrupted by transfer delays	Head of Education	Reorganise visit and approval schedule to allow for ongoing SW work	Obtain temporary contractor cover for required education processes		Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.1.5	Delay in transfer triggers significant political and media scrutiny (FOI requests etc)	HCPC Chief Executive & SMT	On going regular contact with Gvmt depts	Bespoke Communications plan for specific outcomes		Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.1.1	Non financial impact of transfer on HCPC's culture	HCPC Chief Executive & SMT	Communications to managers and employees	Management openness and employees assistance scheme		Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.8.2	Quality That stakeholder management is poorly undertaken by HCPC	Project Lead	Clear identification of stakeholders and early allocation of responsibility within the project team			Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.8.3	Quality That expectations around the data that will be transferred is unachievable given any HCPC systems and data limitations	Project Manager	Accept the risk and manage expectations within the receiving organisation as best as possible			Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.8.5	Time Quality That due to inexperience the receiving organisation is unco-operative or unclear in stipulating their data requirements, which would lead to delays in HCPC preparations	Project Manager	Early expectation setting with the receiving organisation to manage a smooth transferal process			Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.8.6	Time Quality That there are delays in implementing technology solutions in the receiving organisation which could have a knock on effect to HCPC preparations for data transfer	Project Manager	Early expectation setting with the receiving organisation to manage a smooth transferal process			Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.8.8	HCPC's non-Social Worker England projects delayed due to poorly constrained or slipping time scales of Social Worker England project & conflicting commitments	SMT	Monitoring of budget and work plans	Experience of HCPC's EMT	Experience of HCPC project management	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S.13.1	Retain legacy FTP cases without clear case transfer and funding arrangements in place	Head of Fitness to Practice, Director of Finance	Cost allocation and overhead charging method agreed with DfE prior to transfer	Request additional funding for specific cases	Reforecasting budget processes and resource allocation	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S15.3	Social workers may cancel direct debit instructions for their HCPC fees in 2018-19 due to their previous experience of a double registration fee hit when transferring from the GSCC to HCPC in 2012, causing a shortfall in income and additional work.	Finance Director, Head of Registration	Communications plan to support ongoing payment prior to transfer to new regulator	Ongoing regular contact with DH and DfE		Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		
S15.4	Cost of work leading up to the transfer and/or cost of any functions undertaken on behalf of SWE after the transfer not fully covered by DH / DfE grant, including related overheads	HCPC Accounting Officer	Early discussions with DoH & DfE w.r.t. cost of transfer	Undertake fully funded activities only		Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium	Medium		

Changes since the previous iteration of HCPC's Risk Register

Category	Ref#	Description	Nature of change in this version
Strategic Risk added	S.1.11	SWE transfer date not yet set, impacts HCPC activity	New
Communications	S.3.4	SWE comments of HCPC approach to regulation	New
	S.3.5	Service user complaints around FTP process	New
	S.3.6	HCPC employees feel lost or disillusioned	New
Quality Management	S.9.4	Increased turnover of contractor staff, threatens adherence to existing processes	New
Legal	S.12.3	HCPC fails to identify its legal obligations in sharing data prior to SWE's transfer date and the approval of the Transition Order	New
Information Security	S.17.7	Loss of HCPC data or security breaches occur during UAT tests or extracts to SWE during GO-Live date	New

Overview of Risk Management and Risk Treatment process

Throughout the year existing Risk Register & Risk Treatment Plan

the effectiveness of mitigations and the levels of residual risk.

Future risks are also documented, evaluated and monitored against the same criteria.

Every six months these changes and additions to risks are updated in the risk register and formally documented by the Director of Operations or Head of Business Process Improvement, and the Top Ten Risks (High & Medium only after mitigation) are recorded.

Individual risks are linked to the current Statement of Applicability by the ISO27001 Clauses noted in the ISMS Risks column on each page.

Strategic Objectives are linked to individual risks where applicable.

THE HEALTH AND CARE PROFESSIONS COUNCIL
 RISK ASSESSMENT & RISK TREATMENT PLAN August 2019

Strategic

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	mitigation plan deadline	Updates	Date Raised	Escalation	Mitigation completion date	RISK score after Mitigation September 2019	RISK score after Mitigation Feb 2019
1	Strategic		S.1.1	Impact of transfer on HCPC's culture and working practices	HCPC Chief Executive & SMT	Marc Seale	3	4	12	Communications to managers and employees, inc sharing of information and consultation with Employee Forum	Management openness and employees assistance scheme	Papers being placed in council		Regular updates and communications with employees also at the All employee meeting will give employees updates, the next one is on the 10th October 2019				Med	Med
	Strategic		S.1.2	HCPC's reputation damaged by new regulator's early failure to deliver service standards, blaming HCPC hand over	HCPC Chief Executive & SMT	Marc Seale	3	3	9	Level of cooperation with new regulator (joint project boards meetings)	sharing risks, sharing ftp data	PSA oversight inc joint meetings with SWE, DHSC, DfE and HCPC		Quarterly meeting now scheduled with SWE/DFE/DHSC and the PSA has been invited to regular briefings on the project. 27/03/2019: There have been two joint board meetings to review status and key decision making. 2/9/19 Next joint project board 8 October 2019				Low	Low
	Strategic		S.1.3	delay in of ministerial approval of final go live date leads to project failure.	HCPC Chief Executive & SMT	Marc Seale	3	4	12	Draft SW England key assumptions document, v1.0 16th May 2018. Transitional arrangement documents	On going regular contact with Gvmt depts. PSA meetings, infrastructure review authority	Cabinet office infrastructure review June/July 2019		Transitional arrangements now shared with DfE and SWE for approval. 16/05/2019: the project is less likely to fail. 2/9/19 - Ministerial announcement confirming 2 December go live. IPA review scheduled in October.				High	High
	Strategic		S.1.5	Delay in transfer triggers significant political and media scrutiny (FOI requests etc)	HCPC Chief Executive & SMT	Marc Seale	3	3	9	On going regular contact with Gvmt depts	Bespoke Communications plan for specific outcomes	Joint comms planning with SWE and HCPC comms teams. Sharing risks		2/9/19 - Expected transfer date of 2 December now confirmed publicly.				Med	Med
	Strategic		S.1.6	HCPC's working relationship with DHSC is damaged through inability to deliver on time	HCPC Chief Executive & SMT	Marc Seale	3	4	12	On going regular contact with Gvmt depts	own project planning and contacting DHSC. Proactive dialog about transition scheme	meeting project deliverables		2/9/2019 - Ongoing regular dialogue with DHSC and DfE inc progress review meetings hosted by PSA.				Med	Med
	Strategic	merge with 1.2	S.1.8	Reputational damage to HCPC due to SW-E project failure	HCPC Chief Executive & SMT	Marc Seale	3	3	9	Proactive prompting of SW-England project team of potential pitfalls based on HCPC experience	Level of cooperation with new regulator	Bespoke Communications plan for specific outcomes		Grant Thornton Auditors have reviewed HCPC project and we have invited the PSA to review the project. 2/9/2019 - BDO (Internal Audit) scheduled to undertake a review of the SWE transfer project. Scoping doc due w/c 2/9/19				Med	Med
	Strategic	NEW	S.1.9	Risk that the Social Work England project may be cancelled by Government causing rapid change in HCPC operational requirements.	HCPC Chief Executive & SMT	Marc Seale	4	1	4	On going monitoring of project progress and communications from government departments flag potential changes	Ongoing registration with HCPC until actual transfer date with limited shut down of activity until close to migration date	Data transfer scheme and Data Sharing agreement.		Data transfer scheme received on the 15th May. 2/9/2019 - Children and Social Work Act 2017 (Transitional and Savings Provisions) (Social Workers) Regulations drafted.				Low	NEW
	Strategic		S.1.11	SWE's inability to confirm on a new transfer date (Dec 2019 - Feb 2020) may impact HCPC's business as usual activities, resources and finance	HCPC Chief Executive & SMT	Marc Seale	4	4	16	Data transfer scheme	PSA oversight of project	second grant request submitted to DfE		20/03/2019: additional grant submitted to DfE. 1. Additional fitness to practise costs due to the expected two month delay in the transfer date (£618K) 2. Costs incurred due to the transfer of social workers and uncertainties around the transfer date (£998K) 3. A proposal to increase FTP capacity in advance of transfer to help manage the number of open cases that will be transferred to SWE. (£673K) In addition, a contingency fund to cover any run down costs incurred following transfer is also proposed. The request reflects the additional income that HCPC will receive as a result of the two month delay. 08/04/2019: The latest update is that the request is being reviewed by the Government's internal auditors at the request of DfE. 16/05/2019: There is a PWC meeting on the 21st May 2/9/2019 - Grant Funding agreement has been varied to include additional £1,116,033 in respect of second grant request. Maximum grant available is now £3,516,033				Med	High
																	01/09/2019		

THE HEALTH AND CARE PROFESSIONS COUNCIL
 RISK ASSESSMENT & RISK TREATMENT PLAN August 2019

Operations

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date Raised	Escalation/Decision Group	Mitigation completion date	RISK score after Mitigation September 2019	RISK score after Mitigation Feb 2019
	Operations		S.2.1	Operational costs increased due to loss of volume discounts and scalability opportunities	SMT	SMT	2	3	6	Changes to supplier contracts	Potential fee rise to maintain service levels	submission of additional grant requests		27/03/2019: grant submitted on the 20th March. Fee rise has been approved. 2/9/2019 - Grant Funding agreement has been varied to include additional £1,116,033 in respect of second grant request. Maximum grant available is now £3,516,033. Re-tendering of FTP P&P contract underway			01/09/2019	Med	Med
	Operations		S.2.2	Changes to transfer date disrupts to resource planing	SMT	SMT	3	3	9	Delay non time critical work to deliver Social Worker England project	Increase contractor resource	identification of aranges to reduce premature staff turnover (retention allowances)		Requested confirmation of transfer date from the DIE 2/9/19 - Public ministerial confirmation of expected transfer date of 2/12/19. Further IPA review planned for October.				Med	Med
	Operations		S.2.3	Due to no clear govt timetable HCPC delays investment in internal projects	SMT	SMT	3	3	9	Ongoing close monitoring of problematic governmental timetable and objectives	Ongoing reprioritisation of project list			Requested confirmation of transfer date from the DIE 27/03/2019- there is a higher timetable plan. 2/9/19 - Public ministerial confirmation of expected transfer date of 2/12/19. Further IPA review planned for October.				low	Med
	Information Technology	REASSIGNED 06/08/19 Previously an IT Risk - S.5.1	S.2.4	New Regulator fails to deliver to timetable and our operations and performance are compromised (as awaiting transfer out of SW records)	SMT	SMT	3	4	12	Share HCPC's migration expertise with new Regulator project team	Backfill resource			Requested confirmation of transfer date from the DIE. Transitional arrangements agreed and discussion with SWE around an early data transfer point to enable SWE to ingest data ahead of go live date.				Med	Med

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Communications

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019	
	Communications		S.3.1	Reputation damage Causes: 1. Choice of government to need a new and different way of regulating social work. 2. HCPC ineffective at communicating its commitment to the transfer or is seen as dragging its feet 3. SWE criticise HCPC whilst building the case for their existence and to demonstrate their different approach to regulation	Head of Communications, Project Portfolio Mgr	Roz Allison	2	3	6	Position statement & FAQs on website and ready for stakeholder engagement briefings				Complete	Positioning statement developed in case of media concern. Engagement by CEO with key external stakeholders. Regular meetings with SWE communications providing timely insight and messaging aligned.		SMT	Ongoing until end of project	Low	Low
	Communications		S.3.2	Confusion on which regulator to work with. Causes: 1. Social work students and registrants are confused as to where to register and delay registration 2. The public don't understand where to check the register or make a complaint	Head of Communications, Project Portfolio Mgr	Roz Allison	2	4	8	SW hub on HCPC website explaining the transfer and answering FAQs. Post transfer remove all social work references in text and tags within websites on date of transfer and adjust adwords	Clear communication to registrants of date of transfer and HCPC ceases to SW regulator. Send emails with updates (Newsletters)	Monitor social media comments and respond if required	Complete	Social work hub completed and updates shared in emails and news - effective collaboration with SWE Comms on messaging re announcements/ consultation. Joint media and social media monitoring and collaboration on media enquiries taking place.		SMT	Ongoing until end of project	Low	Low	
	Communications		S.3.3	Poor quality communications to all stakeholders. Cause: Lack of communications timeline built into transfer of regulatory service timeline which in itself is not agreed.	Head of Communications, Project Portfolio Mgr	Roz Allison	2	2	4	Build regulatory function transfer timeline into project plan once Transfer order finalised. Build communications timeline into the service transfer timeline ensuring appropriate dependencies are mapped			01/10/2019	Key timelines have been identified with FTP, Education and Registration, but further refinement required for the month prior to the transfer and scenario planning around risks		SMT	Ongoing until end of project	Low	Low	
	Communications		S.3.4	SWs complain that HCPC approach to regulation has been unacceptable through the transfer (particularly FTP, involve, long gaps). Causes: 1. Lack of management expectations from HCPC. 2. Lack of joining up of engagement between SWE and HCPC	Head of Communications, Project Portfolio Mgr	Roz Allison	2	4	8	Build and deliver detailed communications programme (ensure that registrants are supported, especially those with FTP proceedings)	Test communications approach and draft communications with FTP SW partners	Close liaison between regulatory function departments and communications teams between HCPC and SWE allowing joined up planning	01/10/2019	Key changeover communications in preparation re FTP. Close planning between regulatory functions and comms team in HCPC and SWE under way		SMT	Ongoing until end of project	medium	med	
	Communications		S.3.5	Service-user FTP complainants complain about poor process resulting from transfer. Cause: Lack of management expectation from HCPC	Head of Communications, Project Portfolio Mgr	Roz Allison	2	4	8	Build and deliver detailed communications programme (and ensure that we are supportive to registrants who are subject to FTP proceedings)	Test communications approach and draft communications with FTP Case Managers	Close liaison between regulatory function departments and communications teams between HCPC and SWE allowing joined up planning	01/10/2019	Key changeover communications in preparation re FTP. Close planning between regulatory functions and comms team in HCPC and SWE under way		SMT	Ongoing until end of project	med	med	
	Communications		S.3.6	Affected HCPC employees feel forgotten or disillusioned and decide to leave Causes: 1. Lack of coordination and control between HR teams 2. Lack of HR comms plan and careful dependency mapping so changes in other areas of the plan flag knock on impacts to HR comms elements 3. Lack of clarity of transfer date leaves affected employees and partners with feelings of a lack of job security 4. Parliamentary announcement of transfer date precedes proper engagement with affected employees and partners	Head of Communications, Project Portfolio Mgr, Director HR	Roz Allison	2	4	8	Continued close liaison between HR teams resulting in HR timeline and communications plan built into the project plan ensuring dependencies are mapped. Aim for clarity on FTCS 4 months prior to end of contract in this timeline	Communications prior to clarify recognise the emotional impact of the lack of certainty	Discussions with SWE, DIE and DHSC should make clear the need for employee engagement in advance of ministerial announcement if possible		Complete	Transfer date announcements and clarity on contractual implications coordinated. Further changes resulting in financial review need to be managed through as become clear. This will be managed through transformation communications rather than social work transfer comms.		SMT	Complete	med	med

Corporate Governance

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	mitigation plan date	Updates	Date raised	Escalation/ Decision group	mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019	
	Corporate Governance		S.4.1	Changes to Council structure disrupts regular Council member recruitment cycle - appropriate transitional provisions legislation not created	Executive Director of Policy & External Communications, Information Governance Manager	Jacqueline Ladds / Claire Amor	1	2	2	Obtain legal advice around interpretation of requirement	Work with DH to ensure the requirement is fulfilled	None						Low	Low	

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Partners

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan date	Updates	Date raised	Escalation/ Decision group	Mitigation completion	RISK score after Mitigation August	RISK score after Mitigation Feb 2019
	Partners		S.6.1	Loss of Registrants results in shortfall of SW Partners for existing or ongoing FTP cases, pre-transfer	Director of HR, Partner Manager, Head of FTP	Partner Mgr / Brian James	3	2	6	Outsource existing / ongoing SW cases to service provider post transfer	D of E funding of service provider	Outsourced contractors SLA		01/05/2019: the project board agreed to reduce the risk score from a 12 to a 6 as this is now a medium risk.				Med	Med

Education

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	Education		S.7.1	Education providers are confused about which regulator they need to engage with prior to the transfer dated.	Head of Education	Brendon Edmonds	3	2	6	Proactive communications with NewReg to education providers								Low	Low
	Education	CLOSED 08/19	S.7.4	Lack of clarity and clear agreement around SWE data requirements leading to gaps around data transfer	Head of Education,	Brendon Edmonds	4	4	16	Ensure data requirements are documented and formally signed off by both HCPC and SWE.	Ensure the testing cycles for data migration are followed and agreed between HCPC and SWE		03/12/2019	Risk closed as of 24/07/2019 based on a number of UAT carried out on data and shared with SWE for testing. GO-Live plans are now in place which reflect go-live activities based on snapshot of UAT cycles conducted.			03/12/2019	Med	Med
	Education		S.7.5	Multiple education systems related projects being operated (SWE transfer, Website, Education Systems upgrade) at the same time, affecting resources and systems availability to focus on data related activities for this project	Head of Education,	Brendon Edmonds	2	4	8	Effective project management planning and identification of shared critical pathways across projects	Pausing progress where required on lower priority projects		27/11/2019	As this is about resourcing against multiple systems projects, the mitigation will remain live for the duration of the SW project.			27/11/2019	Med	Med
	Education	CLOSED 08/19	S.7.6	Changes delivered by Education System Upgrade project require further changes to migrations tool developed to support data transfer.	Head of Education,	Brendon Edmonds	1	3	3	Capture same risk within Education Systems Major Project	Select migration approach which can accommodate changes to infrastructure/dataschema		03/06/2019	Risk closed as of 24/07/2019 Primarily related to upgrade to SP 2016 having an impact. However this is now in place and testing has been done on this version.			03/06/2019	Med	Med

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Information Technology

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan date	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	Information Technology	Not an IT Risk? Move to Operations section?	S.5.1	New Regulator fails to deliver to timetable and our operations and performance are compromised (as awaiting transfer out of SW records)	Exec Director of IT & Resources, Project Portfolio Mgr	Guy Gaskins	3	4	12	Share HCPC's migration expertise with new Regulator project team	Backfill resource			Requested confirmation of transfer date from the DFE				Med	Med
	Information Technology		S.5.2	Inability to meet the technology data migration timetable	IT, Infrastructure Manager	Jason Roth	3	4	12	HCPC to draft out principles document on arrangements/ plan for migration with suppliers in month of Set 2018	Early engagement with suppliers / clear requirements	Transfer scheme, data sharing agreement						Med	Med
	Information Technology		S.5.3	HCPC may not transfer all of the data required by SWE. This may cause reputational damage to the HCPC.	IT, Infrastructure Manager	Jason Roth	4	3	12	An analysis of data held at the HCPC, and the data required by SWE will be reviewed jointly.	Transfer Agreement will be entered into. A-92-0004, A-92-0003/ data Sharing agreement	SWE sign off migration testing cycles						Med	Med
	Information Technology		S.5.4	Suppliers may not respond in time HCPC's request to create export process	IT, Infrastructure Manager	Jason Roth	3	3	9	effective project planning/ open communication with SWE	Early engagement with suppliers	Issue escalation to senior management						Med	Med
	Information Technology		S.5.5	SWE may change their data requirements after tool has been created/ HCPC process are set in place with suppliers	IT, Infrastructure Manager	Jason Roth	4	3	12	SWE BA assigned to workshop requirements with HCPC teams, and HCPC will run a series on workshops with suppliers to review report, map out an export plan and a DTA before Dec 2018	Agreement of data requirements through transfer agreement and data shaing							Med	Med
	Information Technology		S.5.6	Export process may not be quick enough to allow an export at the final transition week/ weekend	IT, Infrastructure Manager	Jason Roth	4	3	12	Transfer Agreement details test cycles which identify performance	Migration preformed for some systems using large cloud resources	Agreement with SWE for transition period						Med	Med

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Information Security

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion	RISK score after Mitigation August 2019	RISK score after Mitigation April 2019
	Information Security		S.17.3	Apparent loss of SW material in transit, arriving at HCPC after transfer of bulk records to new regulator	IT, Infrastructure Manager	Jason Roth	5	2	10	Communications plan prior to move to NewReg.	Interception at HCPC post room to specific named individual at HCPC	Robust internal processes						Low	Low
	Information Security		S.17.5	Removal of historic Social Worker information and inability to answer FOI requests results in ICO action (availability issues)	Exec Director of IT & Resources, Head of FTP, Head of Governance, Head of Registration	Claire Amor	2	3	6	Early redirection of all FOI requests to NewReg	Generation of FOI'able data table for reporting purposes.	Data transfer agreement, agreed between both parties						Low	Low
	Information Security		S.17.6	Loss of HCPC data or security breaches occur during UAT tests or extracts to SWE before GO-Live date	IT, Infrastructure Manager	Jason Roth	3	3	9	Early mitigation plans in place through the development of an IT principles agreement, and a full scale Data privacy impact assessment	Robust internal processes specifically targeted to hcpc IT teams and all external suppliers/ parties involved in handling data							Low	Low
	Information Security		S.17.7	Loss of HCPC data or security breaches occur during UAT tests or extracts to SWE during GO-Live date	IT, Infrastructure Manager	Jason Roth	3	3	9	Data Transfer agreement and Data Sharing Agreement	UAT data transfer	Robust internal processes (ISO 27001)						Low?	

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Quality Management

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation deadline date	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation April 2019
9	Quality Management.		S9.1	Loss of ISO 9001:2015 Certification Links to 2.3, 10.3	Head of Quality Assurance, CISRO	Paula Lescott, Roy Dunn	4	3	12	Regular & internal audits	QMS standards applied across HCPC	Management buy - in						Low	Low
	Quality Management.	I A7.1.2	S9.2	Employees non-compliance with established Standard Operating Procedures	SMT	SMT	5	2	10	Culture, follow procedures and report errors	Standard Operating Procedures and prevention of overwriting systems	Extend ISO systems as required, regular audits						Low	Low
	Quality Management.		S9.3	Increase in service complaints from existing SW registrants creates backlog	Head of Quality Assurance, Complaints Manager	Paul Robson/ Paula Lescott	3	2	6	Comms plan in place with regular updates for social workers about the impact of the transfer	Previous experience of Social Worker feedback styles	Governance administrator able to cover admin side of complaints if necessary. OMT and SMT complaints on a regular basis						Low	Low
		New	S9.4	Increased turnover of contractor staff, threatens adherence to existing processes	Heads of Departments	Brian James, Richard Houghton and Brendon Edmonds	2	3	6	Culture, follow procedures and report errors	increase level of internal auditing							medium	

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HR

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	HR		S.11.1	Adverse impact on wellbeing and performance of employees concerned about long term future of their role	Director of Human Resources & Org Dev, specific departmental managers	Claire Holt	2	2	4	Regular updates and communications with employees	Retention strategy including hiring new employees on fixed term contracts, focus on engagement, wellbeing and development, change management training and briefings for managers	Employee Assistance programme	Ongoing support and communications to employees	25/04/2019: work is being done on employee engagement and well being, which involved some change management work. This will be rolled out during summer 2019.				Low	Low
	HR		S.11.3	High turnover of employees due to uncertainty leads to resourcing challenges	Director of Human Resources & Org Dev, specific departmental managers	Claire Holt	2	2	4	Agency temps and employees on fixed term contracts engaged to provide additional capacity.	Department of health funding to increase temporary support	Fixed term employees offered permanent contracts if a permanent opportunity becomes available	30/09/2019	25/04/2019: Ben has been reviewing stats from last year. Our turnover percentage has reduced from last year.				Low	Low
	HR		S.11.4	Unavailability or resignation of subject matter experts causing impact to productivity of work/ project timelines or milestones	Director of Human Resources, Specific Departmental managers, Heads of Unit	Claire Holt	3	3	9	Provision of agency temps and employees on fixed term contracts to provide additional capacity. Department of health funding to increase temporary support	Proactively identify subject matter experts and key employees for targeted retention	Fixed term employees offered permanent contracts if a permanent opportunity becomes available	29/11/2019	Budget has been reviewed to account for Backfill resources and recruitment of staff is underway as of Oct 2018. 25/04/2019: Planning has been done in regards to targeted retention.				Low	Low
	HR		S.11.5	Possible impact on HCPC staff being made redundant without clarity on transfer to SWE	Director of Human Resources & Org Dev, specific departmental managers	Claire Holt	1	1	1	Impact on HCPC staff numbers May cause productivity and moral issues with department Ongoing conversations with SWE to clarify on possibility of staff willing to transfer to SWE after GO live date. Update 07/09/18: SWE has recruited a Head of People and Change to manage its HR, training and development. New contact will engage with Teresa Haskins to discuss recruitment and COSOP.	Align timing of HCPC consultation process and SWE recruitment processes for roles included in COSOP arrangements. Likely May - Jul 2019.	HCPC signpost employees to SWE vacancies	29/11/2019	25/04/2019: The budget for 2019/20 indicates that there will be no reduction in employee numbers for those posts that fall under COSOP.				Low	Low
	HR		S.11.6	SWE keen to advertise new posts, need to ensure there are vacancies for employees moving. Low risk for HCPC due to numbers and it being the responsibility of SWE, but something to be aware of.	Director of Human Resources & Org Dev, specific departmental managers	Claire Holt	1	1	1	n/a			Can close	25/04/2019: SWE may hold back a couple of posts just in case we cannot retain all our staff but this very low risk. We will need regular communication between SWE and HCPCs HR Teams.				Low	Low

Legal

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after August 2019	RISK score after Mitigation Feb 2019
	Legal		S.12.1	Poorly drafted legislation around transfer leaves HCPC with unsupported requirements	Exec Director of Policy & External Relations, SMT	Jacqueline Ladds	4	1	4	Proactive involvement with DoE / DH legislators	Experienced HCPC legal advisors							Low	Low
	Legal		S.12.2	Helpful legislation changes not wrapped up in legislation supporting transfer to new Regulator	Exec Director of Policy & External Relations, SMT	Jacqueline Ladds	3	2	6	Proactive involvement with DoE / DH legislators	Experienced HCPC legal advisors							Low	Low

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Project Management

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the on-going risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	Project Management		S.8.1	Time Quality That communication around the content of the transfer order is not forthcoming, leading to a lack of ability for HCPC to sufficiently prepare in time for the transfer	Project Sponsor Project Lead	John Barwick	4	4	16	Early and frequent communication with D of E Project Team / Government departments to ensure that timeframes allocated to the transfer are adequate	stakeholder plan (internal/ external). Preparing material before the announcement of go live date	joint comms between SWE and HCPC teams		UPDATE: 09/08/2019 - We now know that legislation is approved by parliament. However we are still waiting for confirmation to publically announce the final GO-Live date.				medium	High
	Project Management		S.8.2	Quality That stakeholder management is poorly undertaken by HCPC	PMO	HCPC PMO	3	3	9	Clear identification of stakeholders and early allocation of responsibility within the project team				UPDATE: 09/08/2019 - Internal and External Comms plan and Stakeholder engagement plan/ Matrix is being produced by PMO				Med	Med
	Project Management		S.8.5	Time Quality That due to inexperience, the receiving organisation is unco-operative or unclear in stipulating their data requirements, which would lead to delays in HCPC preparations	Project Lead	John Barwick	3	4	12	Early expectation setting with the receiving organisation to manage a smooth transferral process								Med	Med
	Project Management		S.8.6	Time Quality That there are delays in implementing technology solutions in the receiving organisation which could have a knock on effect to HCPC preparations for data transfer	Project Lead	John Barwick	3	4	12	Early expectation setting with the receiving organisation to manage a smooth transferral process	Create a clear set of plan for the transfer of data (systems, method, approach)			UPDATE: Within the data sharing agreement (Annex 3) outlines the method of transfer from HCPC to SWE. HCPC and SWE carried out a number of tests in using a process of using either Azure File or Blob Storage. SWE has confirmed the use of Blob storage as the preferred system for transferring data.				Med	Med
	Project Management		S.8.7	Cost That the cost of the project will exceed HCPC expectations	Project Sponsor	Marc Seale	3	2	6	Experience of HCPC with inbound transfers helps predict outbound costs				UPDATE: HCPC decision to extend resources past September are based on the following terms: There are two groups of people, the first (A) are those currently funded by the DfE grant and those that (B) that are not and are mostly due to end their contracts at the end of September. In terms of those in group (A) – the project can at its discretion extend those resources to the end of Feb 2020. In terms of those in group (B) – their extension is based on agreements dependent post the final approval of the 2nd funding request which is currently under evaluation by PWC. A decision is expected by the DfE / DoHSC by the 16 May 2019.				Low	Low
	Project Management		S.8.8	HCPC's non-Social Worker England projects delayed due to poorly constrained or slipping time scales of Social Worker England project & conflicting commitments	SMT	SMT	5	2	10	Monitoring of budget and work plans	Experience of HCPC's SMT	Experience of HCPC project management		Experience of HCPC project management				Med	Med
	Project Management	give to Marc	S.8.9	Transfer Order fails to enable the delivery of SWE project requirements	HCPC BDB/ Government / D o E	Marc Seale	5	5	25	Engagement of DoE for the need of a transferal order	Experience of HCPC's SMT			UPDATE: HCPC has held a number of joint meetings with the DfE, PSA, DHSC and SWE to discuss progress updates, the status of the data export build plan, the announcement of the transfer date and collaborative working to achieving a Transfer Scheme and Data Sharing agreement.				Low	Low

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Registrations

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	Registration		S.10.1	Poor control of timescale results in applications for Registration being sent to HCPC when we are no longer responsible for profession	Head of Registration & Head of Communications	Richard Houghton / (Jacqueline Ladds) Roz Allison	2	4	8	Extensive Comms campaign to university third year students at HCPC approved courses	Filter applications for registration at Post Room, log names & postcodes, and securely forward to new Regulator		01/10/2019					Low	Low
	Registration		S.10.2	Continuation of SW regulation beyond published dates caused resource shortfall in Reg Dept	Head of Registration & Executive Director of Regulation	Richard Houghton / John Barwick	3	2	6	Upscale resources with contractors in short term	Different contracts are ending at different times/ can extend fix term contracts of needed		01/10/2019	UPDATE: 09/08/2018 - Discussions with HCPC HR and SWE have commenced to explore ideas on how to mitigate this risk as well as agree on details for timescales for transfer and how this impacts staff count at HCPC				Low	Low
	Registration		S.10.3	Limited remit of New Reg functions results in Gvmt request for HCPC to maintain register for unknown period of time, splitting functions	Head of Registration & Executive Director of Regulation	Richard Houghton / John Barwick	2	2	4	Design specific shared regulation processes between SWE & HCPC	Upscale resources with contractors in short to medium term. Changes to NetRegulate implemented in short term.	Regular communication with SWE and HCPC	01/10/2019					Low	Low
	Registration	REASSIGNED 05/06/19 Previously registered under information security (S.17.4)	S.10.4	Delay in deleting SW data to archive status or other exporting impacts delivery of other functionality to NetRegulate, damages integrity of data	Head of Registration	Richard Houghton	3	3	9	Proactive modification of internal deadlines based on evolving requirements.	Project prioritisation process		21-Jan-20					Low	Low
	Registration	REASSIGNED 06/06/19 Previously registered under information security (S.8.4)	S.10.5	Time Quality That expectations around registrant application processing at the point of transfer are unrealistic given the timeframe assigned to the transfer process	Head of Registration	Richard Houghton	3	3	9	Early expectation setting with the receiving organisation to manage a smooth transferral process			TBC	UPDATE: 09/08/2018 - Early dialogue with consultants for FTP. Similar workshop will be developed for Education and Registration functions to determine and agree on transitional arrangements. Update 12/03/2019: Transitional arrangements for each of the regulatory functions have now been agreed between HCPC and SWE. These now provide more definitive timetables and shared understanding of time required to effect a smooth transition. SWE has also indicated that they are preparing to receive more work in progress.				low	High

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Fitness to Practise

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	FTP		S.13.1	Retain legacy FTP cases without clear case transfer and funding arrangements in place	Head of Fitness to Practice, Director of Finance	Brian James, Gordon Dixon (Snr Finance Advsr)	3	2	6	Cost allocation and overhead charging method agreed with DfE prior to transfer	Request additional funding for specific cases	Reforecasting budget processes and resource allocation						Med	Med
	FTP		S.13.2	Maintain FTP function for unknown period of time, rather than project delay	Head of Fitness to Practice, Director of Finance	Brian James, Gordon Dixon (Snr Finance Advsr)	4	2	8	Cost allocation and overhead charging method agreed with DfE prior to transfer	Reforecasting budget processes and resource allocation	Request additional funding for specific cases						Low	Low
	FTP		S.13.3	HCPC's increasing number of cases, increases the complexity of the work done to prepare for the data transfer and the time and volume of data being transferred.	Head of Fitness to Practice, Director of Finance	Brian James, Gordon Dixon (Snr Finance Advsr)	4	2	8	Request registrants funds to help monitor the case load	Joint project to agree data transfer UAT will test assumptions.							Med	Med
	FTP	REASSIGNED 06/06/19 Previously registered under project management (S.8.4)	S.13.4	Time Quality That expectations around case progression at the point of transfer are unrealistic given the timeframe assigned to the transfer process	Head of Fitness to Practice	Brian James,	3	3	9	Early expectation setting with the receiving organisation to manage a smooth transferral process				UPDATE: 09/08/2018 - Early dialogue with consultants for FTP. Similar workshop will be developed for Education and Registration functions to determine and agree on transitional arrangements. Update 12/03/2019: Transitional arrangements for each of the regulatory functions have now been agreed between HCPC and SWE. These now provide more definitive timetables and shared understanding of time required to effect a smooth transition. SWE has also indicated that they are preparing to receive more work in progress.				low	High

Finance

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	Financial		S15.1	Lost contribution caused by transfer of SW in England from HCPC to SW (England)	Finance Director, SMT	Gordon Dixon / SMT	5	5	25	Short Term Financial Plans are being re-worked with a Turnaround Lens							TBC	High	High
	Financial		S15.2	Transfer of SW to SWE substantially reduces HCPC cash balance, since up to £5m of cash balance has been SW fees received in advance. Combined with deficits incurred after transfer due to lost contribution, liquidity may become an issue	Finance Director, SMT	Gordon Dixon / SMT	5	4	20	Short Term Financial Plans are being re-worked with a Turnaround Lens	Arrange borrowing facility with bank if required			Update 25/03/2019 We are developing a three month rolling cash forecasting model to manage payment cycle and income more effectively			TBC	Med	Med
	Financial		S15.3	Social workers may cancel direct debit instructions for their HCPC fees in 2018-19 due to their previous experience of a double registration fee hit when transferring from the GSCC to HCPC in 2012, causing a shortfall in income and additional work.	Finance Director, Head of Registration	Gordon Dixon / Richard Houghton	4	3	12	Only cash received in advance will be transferred to SWE. Data cleansing exercise is being undertaken to increase accuracy of data.				UPDATE: 28/11/18: We are likely to see the effect of these in December, once social workers completes their renewal. So we should be able to update on this risks then.			TBC	Medium	Medium
	Financial		S15.4	Cost of work leading up to the transfer and/or cost of any functions undertaken on behalf of SWE after the transfer not fully covered by DH / DIE grant, including related overheads	HCPC Accounting Officer	Gordon Dixon	4	3	12	Operational risks to be managed within the DIE grant amounts.	Budget already assigned for back fill						TBC	Medium	Medium
	Financial		S15.6	DH fails to reimburse HCPC incurred costs	HCPC Accounting Officer & Finance Director	Gordon Dixon	1	1	1	Monthly DH billing for incurred costs	Project planning, defines when costs to be incurred							Low	Low
	Financial		S15.7	SW fail to renew in 2018 (in attempt to avoid potential double fee charge as in GSCC to HCPC transfer) causing financial shortfall	HCPC Accounting Officer & Finance Director	Gordon Dixon	2	3	6	Only cash received in advance will be transferred to SWE. Data cleansing exercise is being undertaken to increase accuracy of data.				UPDATE: 28/11/18: We are likely to see the effect of these in December, once social workers completes their renewal. So we should be able to update on this risks then. 18/02/19: Likelihood should be increased to 3 – early indication suggest that lapse rate is at 6.4% compared to 4% forecasted. We are reviewing the number of readmissions from SW as they may come back on in January. 26/03/2019: since the 1st December 2018 until 25th March we have received approximately 1,794 readmission forms from social workers.			TBC	Low	low
	Financial		S15.8	HCPC must establish and agree a way to recover costs from SWE regarding PSA levies that would apply to the Social Worker regulation after the transfer date, otherwise there will be an operational budget impact to the HCPC (issue name / description).	Finance Director	Gordon Dixon	3	3	9	Agree a reduced levy, or refund from the PSA based on the transition date (unlikely)	Retain money to cover PSA costs when we transfer the balance of Social Worker fees – will need agreement from SWE			UPDATE: 28/11/18: In August, Marc informed finance and the SMT that we will pay the 100% full PSA levy cost for FY2019/20 and claim the money back from DoH or DIE when the social workers leave the register. Marc will inform HCPC finance when more information is known. Update Update .25/03/2019 Plans in place to recover the rebate from Psa. Already factored in budget			TBC	Low	Low
	Financial		S15.9	SWE/ DIE failure to make timely payments towards scheduled grant claims for SW project	Finance Director	Gordon Dixon	3	3	9	Escalate issues to internal HCPC project board and DIE authorisation group.	Look at penalties in contract for default/ late payments to cover cost through interest percentage on fees claimed						TBC	Low	Low

Policy & Standards

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation August 2019	RISK score after Mitigation Feb 2019
	Policy & Standards			N/A															

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CLOSED

Ref	Category	ISMS Risks	Ref #	Description	Risk owner (primary person responsible for assessing and managing the ongoing risk)	Risk Owner (Names)	Impact before mitigations August 2019	Likelihood before mitigations August 2019	Risk Score = Impact x Likelihood	Mitigation I	Mitigation II	Mitigation III	Mitigation plan deadline	Updates	Date raised	Escalation/ Decision group	Mitigation completion date	RISK score after Mitigation April 2019	RISK score after Mitigation Nov 2018
	Strategic	closed	S.1.4	Brexit reduces availability of governments legal advice to New Reg	HCPC Chief Executive / SMT	Marc Seale	4	3	12	On going regular contact with Gvmt depts				not relevant to HCPC				High	High
	Strategic	closed	S.1.7	Lack of Parliamentary time impacts delivery of project requirements	HCPC Chief Executive & SMT	Marc Seale	4	3	12	On going regular contact with Gvmt depts	Delay project if required by government departments			27/03/2019- the legislative sections have been covered apart from transfers order				High	High
	Strategic	closed	S.1.10	Delay in developing a Data Transfer scheme which outlines the what the lawful requirement are for HCPC in transfer all or any form of Data to SWE	HCPC Chief Executive & SMT	Marc Seale	5	5	25	HCPC to engage with its legal advisers to ensure the transfer is completed ontime.	dialog with DoE and Swe			UPDATE: 26/11/18 HCPC had conversations with BDB and they are able to draw up a relatively brief Data Transfer Agreement cover page to state that, the Statement of Work and the Business Analysis report describes the information sharing agreement between the two organisations. Although the actual sharing of data will still be dependent on the Transitional Order currently being sought from the DIE (and any GDPR agreement) - but the DTA will give us the mechanism to at least start the process with the Suppliers once you have approved the SOW's. 16/05/2019. We have now recieved the Data transfer scheme, so this risk can			medium	NEW	
	Operations	closed	S.2.4	SW fail to renew in 2018 due to avoiding potential double fee charge as with GSCC & HCPC move (or switch to dd rather than full 2 yr pymt)	SMT	SMT	3	2	6	Communications around no double fee requirement, HCPC transfers deferred income to SW-England	Proactive communications on statutory requirement for regulation until new Regulator is in place	Determine if SW-England project allows discretion to transfer recently deregistered SW's		Increased in communication to registrants to renew on time from Sept 2018. 27/03/2019 SWs did renew but less renewed than usual.				Med	Med
	Education	closed	S.7.2	Timing of HCPC's planned disengagement with approvals and monitoring of SW programmes disrupted by transfer delays	Head of Education	Brendon Edmonds	3	3	9	Reorganise visit and approval schedule to allow for ongoing SW work.	Obtain temporary contractor cover for required education processes			04/04/2019: Already made arrangements to resource this				Low	Low
	Education	closed	S.7.3	Substantial delays to SW transfer places unplanned resource requirements on Education dept	Head of Education, Director of Finance	Brendon Edmonds, Tian Tian	2	2	4	Additional grant from DoH England	Obtain temporary contractor cover for required education processes			04/04/2019: no longer relevant				Low	Low
	Project Management	CLOSED	S.8.10	Impact on project schedule due to lack of comms from SWE on the approval of HCPC's supplier SOW (statement of works)	PMO	SWE, HCPC	3	1	3	Engagement of HCPC head of IT and Head of data transfer	Escalation to SWE's CEO - Colum Conway for approvals in order to move the process along			HCPC slowed the pace of this activity to enable the WE BA work to complete, and have included SWE in the Supplier discussions. The suppliers have now been waiting for a couple of weeks for responses from SWE. UPDATE: 10/01/2019 Approval was due by 17 Dec 2018, but was only received from SWE on 10 Jan 2019	11/12/2018	Project Board		Low	Low
	Project Management	CLOSED	S.8.11	Possible impact on project schedule due to the resignation of senior management at EnergySys	Project Manager	Loretta Okoh	1	4	4	Engagement with EnergySys senior management to provide reassurance that knowledge transfer has been carried out to new project manager	Assignment of new senior manager with more knowledge of system and project detail to assist current assigned project manager on the SW project			Update: 19/02/19: Energysys has assigned a project manager to HCPC to manage the work in the absence of the resigned staff. 27/03/2019- Tool came in yesterday. The extraction files are being loaded.	19/02/2019	Project Board		Low	Low
	Project Management	CLOSED	S.8.12	Lack of clarity on the start and end date of the export tool required by Delta Scheme	PMO	PMO	5	5	25	Engagement with Delta Scheme to renegotiate current timeline by moving start and end date forward	Engagement with Delta Scheme to provide additional resources in order to speed the process - however at an additional cost to HCPC			27/03/2019 Deltascheme: employee overestimated the time. The tool should be with us by the 3rd week in April. Instead of 2 months time	19/02/2019	Project Board		Med	Med
	HR	closed	S.11.2	HCPC and new regulator disagree on application of COSOP causing uncertainty for employees	Director of Human Resources & Org Dev	Ben Spittles	2	2	4	HR / Employment legal advice	Communication and relationship building with new regulator and Department of Health	New employees recruited on fixed term contracts to manage expectations		25/10/2019: Application has been closed. Only 3 roles match SWE recruitment drive. There should not be any reductions in the roles that have matched.				Low	Low
	Financial	CLOSED	S.15.5	If the transfer date slips past 1 December 2018, special fee arrangements may need to be made for social workers, requiring extra admin/systems effort and costs	Finance Director	Tian Tian	3	3	9	Ongoing regular contact with DH and DIE				Not valid as the transfer date will be past 1 December 2018. Registrants will not be offered any special arrangements as the decision is to collect the fees for the whole two years and transfer any deferred income to SWE.				Low	Low
	Strategic	CLOSED	S.1.6	HCPC's working relationship with DoH is damaged through inability to deliver on time	HCPC Chief Executive & SMT		3	4	12	On going regular contact with Gvmt depts				There is utility to be any further Governemnt time required, therefore this risk has been removed.					
	Information Security	NOT a HCPC Risk to be managed (CLOSED #8119)	S.17.1	Loss of electronic SW registrant information by new regulator during transfer process	Government / New Regulator	DIE, SWE	5	1	5	HCPC-IT deliver data extract in highly secure manner, encrypted, password protected	Robust internal processes to ensure an non-negative impact to HCPC and SWE							Low	Low
	Information Security	NOT a HCPC Risk to be managed (CLOSED #8119)	S.17.2	Loss of paper SW applicant / registrant information by new regulator during transfer process	Government / New Regulator	DIE, SWE	5	1	5	Use of couriers, with signatures, to pre-named parties only.	ISO27001 compatible processes used	Robust internal processes						Low	Low
	EDUCATION	REASSIGNED 06/06/19 Previously registered under project management (S.8.4)	S.8.4	Time Quality That expectations around course approval at the point of transfer are unrealistic given the timeframe assigned to the transfer process	Head of Education	Brendon Edmonds	3	3	9	Early expectation setting with the receiving organisation to manage a smooth transferal process				UPDATE: 09/08/2018 - Early dialogue with consultants for FTP. Similar workshop will be developed for Education and Registration functions to determine and agree on transitional arrangements Update 12/03/2019: Transitional arrangements for each of the regulatory functions have now been agreed between HCPC and SWE. These now provide more definitive timetables and shared understanding of time required to effect a smooth transition. SWE has also indicated that they are preparing to receive more work in progress.				low	High
	Legal	Closed	S.12.3	HCPC fails to identify its legal obligations in sharing data prior to SWE's transfer date and the approval of the Transition Order	Information Governance manager, HCPC legal teams	Claire Amour	3	2	6	Proactive involvement with GDPR officers to map out legal obligations	Experienced HCPC legal advisors			11/06/2019: We have the Transfer Scheme and DSA in place			12/06/2019	Low	Low

Glossary & Abbreviations

Term	Meaning	ISO27001 Term	Meaning
AGM	Annual General Meeting	ISO27001:2013 A5	Security Policy Management
BCP / BCM	Business Continuity Plan / Business Continuity Management (Disaster Recovery and associated processes)	ISO27001:2013 A6	Corporate Security Management
CCM's	Council & Committee Members	ISO27001:2013 A7	Personnel Security Management
CDT	Cross Directorate Team (formerly HCPC's Middle Management Group)	ISO27001:2013 A8	Organizational Asset Management
CPD	Continuing Professional Development	ISO27001:2013 A9	Information Access Management
DH	Departments of Health in Home countries	ISO27001:2013 A10	Cryptography Policy Management
DfE	Department for Education	ISO27001:2013 A11	Physical Security Management
EEA	European Economic Area, = European Economic Union, plus Norway, Iceland, plus for our purposes Switzerland	ISO27001:2013 A12	Operational Security Management
EMT	HCPC's Executive Management Team (closed down May 2018, responsibilities taken over by SMT & OMT)	ISO27001:2013 A13	Network Security Management
EU	European Economic Union (formerly known as the "Common Market")	ISO27001:2013 A14	System Security Management
FReM	Financial Reporting Manual	ISO27001:2013 A15	Supplier Relationship Management
FTP	Fitness to Practise	ISO27001:2013 A16	Security Incident Mangement
GP	Grandparenting	ISO27001:2013 A17	Security Continuity Management
HSWPO	Health and Social Work Professions Order (2001)	ISO27001:2013 A18	Security Compliance Management
HR	Human Resources		
HW	Abbreviation for computer hardware		
ISMS	Information Security Management System (ISMS) risk		
Impact	The result of a particular event, threat or opportunity occurring. Scored between 1 least effect on HCPC and 5 maximum effect on HCPC.		
ISO	International Standards Organisation (the global governing body for the Quality standards used by HCPC)		
ISO 9001:2008	The ISO Quality Management Standard used by HCPC.		
ISO 27001:2013	The ISO Information Security Standard used by HCPC.		
IT	Risk Register & Risk Treatment Plan		
Likelihood	Used to mean Probability of the event or issue occurring within the next 12 months		
MIS	Management Information System		
MOU	Memorandum of Understanding		
NetRegulate	The bespoke computer application used to manage the application, registration and renewal processes, and publish the online register		
New Reg	New bespoke regulator for Social Workers in England		
OIC	Order in Council		
OJEU	Official journal of the European Union		
OMT	Operation Management Team 2019 onwards		
Onboarding	The process of bringing a new profession into statutory regulation from HCPC's viewpoint		
OPS	Operations		
PSA	Formerly (CHRE), renamed Professional Standards Authority for Health and Social Care in the 2012 legislation.		
PLG	Professional Liason Group		
Probability	Likelihood, chance of occurring. Not the "mathematical" probability. Scored between 1 least likely and 5 most likely to occur within the next year.		
Q	Quality Management System (QMS) Risk		
QMS	Quality Management System, used to record and publish HCPC's agreed management processes		
Risk	Any uncertain event/s that could occur and have an impact on the achievement of objectives		
Risk Owner	The person or entity that has been given the authority to manage a particular risk and is accountable for doing so.		
Risk Score	Likelihood x Impact or Probability x Significance		
SI	Statutory Instrument		
Significance	Broadly similar to Impact		
SMT	Senior Management Team		
SSFS	Scheme Specific Funding Standard, a set of standards relating to pensions services		
STD	Standards		
SW	Abbreviation for computer software		
SW (England)	Name of the new Social Work regulator in England		
VPN	Virtual Private Network, a method of securely accessing computer systems via the public internet		

HCPC RISK MATRIX

IMPACT	Public Protection	Financial	Reputation								
	Catastrophic 5 A systematic failure for which HCPC are ultimately responsible for, exposes the public to serious harm in cases where mitigation was expected.	Catastrophic 5 Unfunded pressures greater than £1 million	Catastrophic 5 Incompetence/ maladministration or other event that will destroy public trust or a key relationship	5	10	15	20	25			
	Significant 4 A systematic failure for which HCPC are ultimately responsible for, exposes more than 10 people to harm in cases where mitigation was expected.	Significant 4 Unfunded pressures £250,000 - £1 million	Significant 4 Incompetence/ maladministration that will undermine public trust or a key relationship for a sustained period or at a critical moment.	4	8	12	16	20			
	Moderate 3 A systemic failure for which HCPC are ultimately responsible for exposes more than 2 people to harm in cases when mitigation was expected.	Moderate 3 Unfunded pressures £50,000 - £250,000	Moderate 3 Incompetence/ maladministration that will undermine public trust or a key relationship for a short period. Example Policy U-turn	3	6	9	12	15			
	Minor 2 A systemic failure which results in inadequate protection for individuals/individual communities, including failure to resolve celebrity cases.	Minor 2 Unfunded pressures £20,000 - £50,000	Minor 2 Event that will lead to widespread public criticism.	2	4	6	8	10			
	Insignificant 1 A systemic failure for which fails to address an operational requirement	Insignificant 1 Unfunded pressures over £10,000	Insignificant 1 Event that will lead to public criticism by external stakeholders as anticipated.	1	2	3	4	5			
KEY			Negligible1	Rare 2	Unlikely 3	Possible 4	Probable 5				
<div style="background-color: red; color: white; padding: 5px; text-align: center;">>11 High Risk: Urgent action required</div> <div style="background-color: yellow; color: black; padding: 5px; text-align: center;">6-10 Medium Risk: Some action required</div> <div style="background-color: lightgreen; color: black; padding: 5px; text-align: center;"><5 Low Risk: Ongoing monitoring required</div>			Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Only small chance of occurring in the lifetime of the strategy.	May well occur during the lifetime of the strategy.	Likely to happen at some point during the next one or two years.	"Clear and present danger", represented by this risk - will probably impact on this initiative - sooner rather than later.	Strategic			
			Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Not likely to occur during the lifecycle of the programme of project.	May occur during the life of the programme or project.	Likely to happen in the life-cycle of the programme or project.	Likely to occur in the life-cycle of the project, probably early on and perhaps more than once.	Programme / Project			
			Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Does not happen often - once every six months.	May well happen on a monthly basis.	May well happen on a weekly basis.	The threat is likely to happen almost every day.	Operational			
LIKELIHOOD →											

RISK MATRIX DEFINITIONS

IMPACT TYPES

	Public Protection	Financial	Reputation
	Catastrophic 5	Catastrophic 5	Catastrophic 5
IMPACT	A systematic failure for which HCPC are ultimately responsible for, exposes the public to serious harm in cases where mitigation was expected.	Unfunded pressures greater than £1 million	Incompetence/ maladministration or other event that will destroy public trust or a key relationship
	Significant 4	Significant 4	Significant 4
	A systematic failure for which HCPC are ultimately responsible for, exposes more than 10 people to harm in cases where mitigation was expected.	Unfunded pressures £250k - £1 million	Incompetence/ maladministration that will undermine public trust or a key relationship for a sustained period or at a critical moment.
	Moderate 3	Moderate 3	Moderate 3
	A systemic failure for which HCPC are ultimately responsible for exposes more than 2 people to harm in cases when mitigation was expected.	Unfunded pressures £50,000 - £250,000	Incompetence/ maladministration that will undermine public trust or a key relationship for a short period. Example Policy U-turn
	Minor 2	Minor 2	Minor 2
	A systemic failure which results in inadequate protection for individuals/individual communities, including failure to resolve celebrity cases.	Unfunded pressures between £20,000-£50,000	Event that will lead to widespread public criticism.
Insignificant 1	Insignificant 1	Insignificant 1	
A systemic failure for which fails to address an operational requirement	Unfunded pressures over £10,000	Event that will lead to public criticism by external stakeholders as anticipated.	

LIKELIHOOD AREAS

	Strategic	Programme / Project	Operational
	Probable 5	Probable 5	Probable 5
LIKELIHOOD	"Clear and present danger", represented by this risk - will probably impact on this initiative - sooner rather than later.	Likely to occur in the life-cycle of the project, probably early on and perhaps more than once.	The threat is likely to happen almost every day.
	Possible 4	Possible 4	Possible 4
	Likely to happen at some point during the next one or two years.	Likely to happen in the life-cycle of the programme or project.	May well happen on a weekly basis.
	Unlikely 3	Unlikely 3	Unlikely 3
	May well occur during the lifetime of the strategy.	May occur during the life of the programme or project.	May well happen on a monthly basis.
	Rare 2	Rare 2	Rare 2
	Only small chance of occurring in the lifetime of the strategy.	Not likely to occur during the lifecycle of the programme of project.	Does not happen often - once every six months.
Negligible1	Negligible1	Negligible1	
Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	Extremely infrequent – unlikely to happen in a strategic environment or occur during a project or programmes lifecycle. May occur once a year or so in an operational environment.	

HCPC Strategic Priorities 2018 - 2020

code

SP1.Perf	Strategic priority 1: Improve our performance to achieve the Professional Standards Authority's Standards of Good Regulation
SP2.Com	Strategic priority 2: Ensure our communication and engagement activities are proactive, effective and informed by the views and expectations of our stakeholders
SP3.Adapt	Strategic priority 3: Ensure the organisation is fit for the future and is agile in anticipating and adapting to changes in the external environment
SP4.Evid	Strategic priority 4: Make better use of data, intelligence and research evidence to drive improvement and engagement

HCPC has an **averse** appetite to risk in that we;

- a. Identify all relevant risks
- b. Mitigate those risks to an appropriate level
- c. Invest mitigation resources in proportion to the level of risk