
HCPC Internal and External audit recommendations tracker

Executive Summary

This report provides the Committee with progress updates on the implementation of recommendations arising from Internal and External audits. In addition, any significant Quality Assurance recommendations and recommendations arising from ISO standard audits will be added.

Recommendations which have been implemented have been removed from this report. The original numbering of recommendations has been retained.

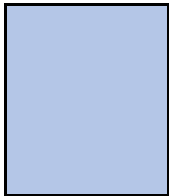
Please refer to individual internal audit reports for the background to recommendations.

Previous consideration	This is a standing item considered at each meeting of the Committee.
Decision	The Committee is asked to discuss and note the report.
Next steps	The next report will be received in November 2023
Strategic priority	All
Risk	All
Financial and resource implications	None as a result of this paper.
Author(s)	Ewan Shears, Secretary to the Committee ewan.shears@hcpc-uk.org
ELT Sponsor	Claire Amor, Executive Director of Governance Assurance & Planning claire.amor@hcpc-uk.org

Internal Audit report – FITNESS TO PRACTISE – END TO END (considered at Audit and Risk Assurance Committee 14 June 2023)

Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 0
Medium	1	Not yet due 0
Low	2	Completed 3



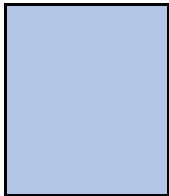
Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>1 Where agreed KPIs are not formally documented within policies, procedures and guidance there is a risk that HCPC do not manage cases timely which can have detrimental impacts on both public safety and the well-being of practitioners. There should be a formalised regular review process in place for guidance and policies to ensure completeness.</p> <p>1. We recommend that fitness to practise policies, procedures and guidance:</p> <p>a) formally include the KPIs staff are expected to achieve for managing fitness to practise cases.</p> <p>b) Include a documented review and approval process.</p>	<p>a) KPIs will be added to relevant best practice standards (guidance) documents.</p> <p>b) A documented review and approval process will be added to all fitness to practise policies and best practice standards (guidance)</p>	<p>Laura Coffey – Head of Fitness to Practise</p> <p>a) 30 June 2023</p> <p>b) 31 July 2023</p>	<p>Completed</p>	<p>KPIs are now included in relevant Best Practice Standards.</p> <p>All Best Practice Standards now have version control and a documented review and approval process.</p>	N/A

<p>2 Where there is no direct reference to PSA standards within the FtP documentation and via the website there is a risk that staff do not understand the underlying principles and expected behaviours when managing FtP cases.</p> <p>We recommend HCPC directly reference in either guidance or on the HCPC website reference to the PSA standards and how these support in a safer environment for all stakeholders.</p>	<p>This information will be added to our website in the next deployment.</p>	<p>Tony Glazier, Communications Lead.</p> <p>1 September 2023</p>		<p>We have published a new page on the HCPC website which explains the role of the PSA, and it's standards that our performance is measured against. www.hcpc-uk.org/about-us/corporate-governance/oversight/</p>	<p>N/A</p>
<p>3 Where reports do not highlight the key message of the report content upfront to the desired audience, there is a risk that decisions made may not be as effective, as information can be too much and therefore convoluted.</p> <p>We recommend that a summary of KPI achievement and progress against the FtP improvement plan is highlighted at the start of the report allowing key messages to be clear to readers.</p>	<p>We will undertake a review to ensure that the report remains relevant and useful.</p>	<p>Laura Coffey – Head of Fitness to Practise</p> <p>31 December 2023</p>		<p>We have reviewed the recommendation and will be maintaining our current report format for the time being. The reporting content and approach has been agreed with Council and it is important the report format is consistency to aid with demonstrating comparisons. Data is amended or new data introduced following disucssion with Council.</p> <p>New KPIs will be introduced when we commence frontloaded investigations in house. Our reporting will be updated at that time to align with those changes, in consultation with Council.</p>	<p>N/A</p>

Internal Audit report – Diversity Review (considered at Audit and Risk Assurance Committee 15 March 2023)

Recommendations summary

Priority	Outstanding recommendations	Status	
High	0	Overdue	0
Medium	0	Not yet due	1
Low	1	Completed	0

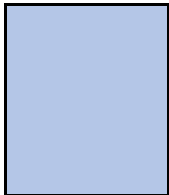


Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>4 If the topics detailed above are not included in benchmarked training, staff members may not have sufficient awareness over compliance and reporting requirements in relation to ED&I, nor may they be sufficiently aware of the process of challenging and reporting inappropriate behaviour</p> <p>We recommend that management consider refreshing the ED&I training module and including the areas of good practice noted above.</p>	<p>We will be refreshing the EDI module this new FY, and will consider the content suggested identifying elements most relevant for staff training.</p>	<p>31 March 2024</p> <p>Tehmina Ansari – L&D Manager</p>		<p>The review of the EDI module is remains underway.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

Internal Audit report – Unified Assurance Framework (considered at Audit and Risk Assurance Committee 15 March 2023)

Recommendations summary

Priority	Outstanding recommendations	Status	
High	0	Overdue	0
Medium	2	Not yet due	2
Low	1	Completed	1



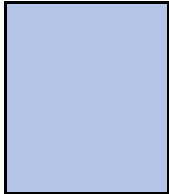
Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>1, 2 & 3 The current approach to determining the control environment in each department may mean that key aspects of the line 1 control environment is overlooked. Furthermore, lack of a Quality Framework may make it more difficult to compare the adequacy and effectiveness of controls operating across the organisation.</p> <p>1. Develop a Quality Framework that contains ‘pillars’ to create a standard way in which to assess the control environment across departments. These pillars could include Policies and Guidance, Induction and Training, Quality Checks / Peer Review, Continuous Improvement and Performance Monitoring, as examples (Year 1).</p> <p>2. For each pillar, design high level guidance setting out expectations for the expected controls to be captured within each pillar, including a good/better/best system of self assessment to support continuous improvement (Year 1).</p> <p>3 Ask teams to complete a self-assessment against each of the pillars, utilising the good practice guidance. Collate these responses and use them as the basis for the population of the UAF (Year 2).</p>	<p>The variability of level 1 assurance activity across departments reflects the existing matrix of departmental workload, resources, processes and stability of those variables. Level 1 check enhancement may require resources greater than those possible under existing financial constraints.</p> <p>However, efforts to include these potential pillars will continue and progress to deliver against these pillars will be monitored.</p>	<p>Requires a complete cycle of audits to create and check compliance</p> <p>01/03/24 Year 1 activities and 01/03/25 Year 2 active use in UAF.</p> <p>Anna Raftery, Head of Assurance and Compliance.</p>		<p>As the R&A meetings continue more clarity is being added to the identified "core" assurance areas (guidance & process, Training & induction, reporting, quality checks). As a lot of this information will not change quarter to quarter, once we have the details we can focus on the quality check outcomes, gaps, and improvements more effectively.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

5 & 6	<p>Failure to have an independent assessment of controls could result in an unreliable or inaccurate assessment of control adequacy and effectiveness, thus giving those charged with governance false assurance as to the efficacy of HCPC's system of governance, risk management and internal control.</p> <p>5. Following implementation of recommendations 1-4, The Quality Assurance Team should introduce a rolling programme of reviews of team assurance maps over a three-year cycle, assessing the veracity of the self-assessment statements and providing an independent assessment of the strength of the control environment (Year 2).</p> <p>6. As part of the above process, collate information on best practice observed and use this to continually improve the good practice guidance and Quality Framework (Year 2).</p>	<p>Departmental self-assessment statements and methods will be evaluated on a case by case basis, to check the veracity of claimed effectiveness, and share best practise where observed and applicable to other departments.</p>	<p>1 March 2024</p> <p>Anna Raftery, Head of Assurance and Compliance.</p>		<p>Still in planning stage, will need to be re-scoped with new priorities and resource implications.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>
7	<p>The organisation may exhaust a disproportionate amount of resource trying to mitigate against a risk that senior management and the Board may be willing to accept, reducing the efficiency and effectiveness of the risk management process. Our earlier recommendations to have more proactive local manager involvement in the risk, control and assurance framework could widen the disconnect with the corporate risk appetite thinking.</p> <p>7. Incorporate risk appetite into discussions around risk as part of the quarterly update process and consider whether a target risk score, linked to the organisation's risk appetite statement should be included within the Risk Register.</p>	<p>We will be refreshing the EDI module this new FY, and will consider the content suggested identifying elements most relevant for staff training.</p>	<p>1 July 2023</p> <p>Roy Dunn. CISRO</p>		<p>The risk appetite will gradually be collected for each specific risk, after consultation with the risk owner. The CISRO and Head of Assurance and Compliance will continue to meet risk owners on a quarterly basis as previously reported. This is unlikely to change. <i>This action should be closed.</i></p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

Internal Audit report – Registrant Forecasting Review (considered at Audit and Risk Assurance Committee 9 November 2022)

Recommendations summary

Priority	Outstanding recommendations	Status	
High	0	Overdue	3
Medium	3	Not yet due	0
Low	0	Completed	0



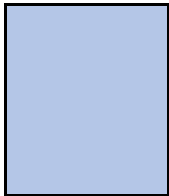
Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>2 Where updates made to the assumptions applied within the model are manually updated within the output report there is a risk that errors and conflicting numbers are produced which can result in ambiguity as to which is the correct data and thus the accuracy of the registrant numbers being produced which ultimately are used for decision making purposes.</p> <p>We recommend that a method of cross-referencing is considered between the output report generated by the model and the inputs section, to prevent users from potentially being misled.</p>	<p>This exercise will become part of the regular periodic reconciliations for our month-end reporting.</p>	<p>January 2023</p> <p>Jagana Abubacarr – Finance BP</p>	<p>Revised completion date: end of March 2023</p>	<p>Various model parameters are tested when unexpected changes are produced, and the model file names reflect those variables, such as 200% intl growth, or 50% reduction intl. In this way various input parameters are tested and used to evaluate the most likely realistic outcome. Business Central Re-implementation still ongoing and go live expected in December 2023, further update likely in January 2024</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

<p>4 Where there is manual intervention, for example extracting the number of registrants from the model and importing into the Financial model there is a risk that errors arise which can ultimately affect decision making and further numbers generated.</p> <p>4. a) Investigate whether it is possible to do an automated upload from the model into the Financial model. If this is not possible, consider whether the model can be adapted to include what is required for the Financial model with less manual intervention. A secondary check should be undertaken for all data extracted from the model that is incorporated into the Financial model to verify accuracy.</p> <p>4. b) Consider if it is possible to incorporate and thus easily identify from the model the number of registrants on discounted registrant fees and those on full registrant fees to support the Finance team further.</p>	<p>This is happening already, to a certain extent, whereby registrant numbers are extracted from the CRM system to inform our financial figures. Further work will need to be carried out to incorporate this seamlessly as part of the overall process.</p>	<p>January 2023</p> <p>Jagana Abubacarr – Finance BP</p>		<p>Business Central Re-implementation still ongoing and go live expected in December 2023, further update likely in January 2024</p>	<p>Commentary History See Appendix 1 or</p> <p>[PRESS]</p>
<p>5 Variances in registrant data may go undetected, which may result in model adaptations not made and/or investigation into variances not taking place</p> <p>We recommend that the Forecasting team check whether the variance analysis built into the model operates as intended.</p>	<p>Once the full handover of registrant forecasting is completed and the area is managed by the Finance Team, we will create specific reports to identify key variances for the specific areas of income and the key drivers for the movements between actuals and forecast.</p>	<p>January 2023</p> <p>Ifeoluwa Ojo, Senior Finance BP</p>	<p>Revised completion date: end of September 2023</p>	<p>Business Central Re-implementation still ongoing and go live expected in December 2023, further update likely in January 2024</p>	<p>Commentary History See Appendix 1 or</p> <p>[PRESS]</p>

Internal Audit report – Education Standards (considered at Audit and Risk Assurance Committee 9 June 2022)

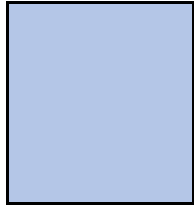
Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 1
Medium	0	Not yet due 0
Low	1	Completed 0



Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>1 Key Risk Area 1: Suitable organisations are appointed to deliver educational programmes</p> <p>HCPC should continue to keep the standards under review and provide an annual update to the Education and Training Committee highlighting any issues which have arisen that could prompt an interim review mid-cycle.</p>	<p>Action: Develop an annual reporting mechanism to highlight any issues that could prompt an interim review of the Standards to the Education and Training Committee.</p>	<p>Action Owner: Head of Policy, Standards and Strategic Relationships</p> <p>Completion date: 31/08/2022</p>	<p>Revised date 31 December 2022</p> <p>2nd Revised date: Due to commence Q4.</p>	<p>The SETs review is still planned to begin in Q4 of this financial year.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

Internal Audit report – HCPC Intelligence Gathering (considered at Audit and Risk Assurance Committee 10 March 2021)
 Recommendations summary



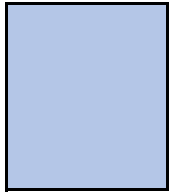
Priority	Outstanding recommendations	Status	
High	0	Overdue	1
Medium	1	Not yet due	0
Low	0	Completed	0

Recommendation / Priority (RAG)	BDO's follow up review findings	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>4 Key Risk Area 1: Strategy and Governance 1.2 Data strategy – data platform approach</p> <p>Decisions need to be made formally on what data analysis work is done using the front line systems such as registration & FtP and that drawn from the new data platform. Some data may be available 'self-service' and other will need analysis work.</p>	<p>In Progress - The initial priorities for the Insight and Intelligence function have been defined in the Insight and Intelligence Framework approved in September 2021. We reviewed the approved Insight and Intelligence Framework document and the meeting minutes for the September 2021 Council meeting that showed the evidence of approval. A Council seminar was held on 7 April 2022 to receive and discuss analysis of FtP and EDI data to date. We reviewed the presentation pack for this seminar. We reviewed the data analysis document in relation to FtP and EDI presented to the Council Seminar on 7 April 2022. This is in line with the initial management response in relation to analysis of EDI and FtP.</p> <p>However, Management should establish a plan to develop the CPD analysis for this recommendation to be fully implemented, in addition to the analysis about EDI and FtP data.</p>	<p>Completion date: End of Q4 2021</p> <p>Responsible Officer: Geoff Kirk (Head of IT & Digital Transformation)</p> <p>Gareth Davies Head of Insight and Analytics</p>		<p>Analysis of FTP reporting requirements and data quality issues is currently underway.</p> <p>A review of the current HCPC data platform has been carried out and a technical roadmap developed to set out how this will be further enhanced to support HCPC's needs.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

Internal Audit report – Registration Payment Process (considered at Audit and Risk Assurance Committee 9 June 2022)

Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 1
Medium	1	Not yet due 0
Low	0	Completed 0



Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
<p>2 Key Risk Area 2: Systematic issues from the 2020/21 financial reporting exercise have been cleared</p> <p>A long-term solution systems-based solution should be introduced which eliminates, as much as reasonably practicable, the requirement for complex monthly reconciliations and manual journal postings to HCPC's finance system.</p> <p>Status update from BDO following Follow up Audit June 2023: HCPC are working with KPMG to implement the new finance system having a provisional go-live date of early July 2023. However, due to a required extension to the Vision and Validate stage, and subsequent expiration of must-have scope, there is now a revised due date is December 2023</p>	<p>Paper submitted to Exec Team stating that a retender will be undertaken to ensure we are covered by the correct CCS Framework agreement and a staggered project implementation approach, as we have an existing platform and partial implementation from which to build on. In the interim, we are close to completing our manual income reconciliations with a level of automation introduced within our files to produce expected revenue, based on our fee structure, which is dependent on the specific renewal cycle and also the type of applicant/registrant (UK or International). This is then compared against the amounts in Business Central and any differences are investigated and, thereafter, corrected within Business Central and/or Customer Engagement (CRM system). Once all corrections and adjustments are made, a final summary check will be carried out to ensure total amounts in BC versus total amounts for expected revenue match. Our reconciliation files will hold data on an individual basis, which will enable us to provide detailed backing of our recognised income and deferred income to audit.</p> <p>We have set a deadline for potential suppliers to submit their bids to undertake the Business Central Reimplementation Project by 10th June.</p>	<p>Action Owner: Mahmoud Hamed (Finance Operations Manager)</p> <p>Completion date: 10 June for receipt of bids, timescales</p> <p>Date for a single finance system - 31 March 2023.</p>	<p>Revised Date: Provisional go live date is now JULY 2023</p> <p>revised provisional go live date of November/December 2023</p>	<p>As previously reported, we have concluded the Vision & Validate phase of the project, which resulted in additional workshops and reviews. This has had a knock-on effect on the original go-live date of July 2023 with a revised provisional go-live date of November 2023. We are in discussions with our current supplier to agree the proposed project timelines.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

Internal Audit report – Safeguarding controls (considered at Audit and Risk Assurance Committee 9 March 2022)

Recommendations summary

Priority	Outstanding recommendations	Status
High	0	Overdue 2
Medium	2	Not yet due 0
Low	0	Completed 0



Recommendation / Priority (RAG)	Management response	Timescale/Responsibility	Completion Date/Status	Current Commentary	Commentary log
Committee note (March 2022): Whilst some of the management actions were reported as being contained in workplans and therefore completed, the Committee agreed that those actions should remain active in the recommendation tracker with implementation dates until completed.	N/A	N/A	N/A	N/A	N/A
<p>4 Key Risk Area 2: Guidance to registrants on standards and safeguarding risks</p> <p>HCPC should develop a suite of safeguarding materials aimed at assisting registrants manage key safeguarding risks which they may encounter during the course of their professional roles. These materials should be readily available to registrants through HCPC's website. This should be benchmarked against the safeguarding materials provided by other healthcare professions regulators.</p> <p>HCPC should also consider delivering specific safeguarding guidance sessions as part of the programme of Professional Liaison Service webinars.</p> <p>Status update from BDO following Follow up Audit June 2023: Webinars have been developed by HCPC and attended by staff to help increase safeguarding awareness across the organisation. For example, the #myhpcstandards webinar on safeguarding, which included a survey where 95% of staff rated the webinar as good and above. Work is ongoing with updating policies, procedures and guidance and subsequently making these more accessible to staff. Revised due date: September 2023</p>	<p>While we have materials relevant to safeguarding (eg #MyStandards webinars) these are not readily accessible or specifically flagged as safeguarding materials. There is an opportunity to review our materials and update/improve them via the planned review of our Standards of Conduct, Performance and Ethics, due in 2022/23.</p> <p>Action: (1) Add to 2022/23 Policy and Comms team workplans. (2) Add safeguarding to 2022/23 Prof Liaison event programme.</p>	<p>Action Owners: Rachael Gledhill (Head of Policy & Strategic Relationships), Kim Tolley, (Professional Liaison Project Lead), Tony Glazier (Communications Lead)</p>	<p>Revised due date: September 2023</p>	<p>RG: Consultation on the SCPEs did close in June and the revised standards will go to October Council. Supporting guidance will be produced as planned in Q4.</p> <p>KT: Five HCPC #myhpcstandards have been delivered and evaluated. Evaluation data is available - which looks at the professions we reached, the number of attendees, hits to the videos on our website, changes in their level of knowledge.</p> <p>New HCPC material is about to be launched on our website - Comms will hold the list of what we are adding - fact sheets, videos.</p> <p>Safeguarding has been covered in sessions that the Professional liaison team delivers - it is incorporated in scenarios used and particularly in the monthly joining the UK workforce sessions for international registrants.</p> <p>TG: Comms support will be provided when it comes to promoting the new standards and guidance, and creating content to support understanding.</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>

<p>6 Key Risk Area 4: Controls to identify safeguarding issues identified through DBS</p> <p>HCPC should explore the feasibility of having a formal relationship with Disclosure Scotland as it currently has with the DBS, whereby the DBS proactively alerts the HCPC of registrants who have been arrested or convicted for a serious criminal offence.</p> <p>Status update from BDO following Follow up Audit June 2023:</p> <p>The Chief Information Risk and Security Officer (CIRSO) has contacted Disclosure Scotland to investigate implementing a formal relationship with them. Further action is required to establish what this relationship may look like.</p> <p>Revised due date: September 2023</p>	<p>Action: The DBS covers both England and Wales and NI. We do have a relationship with Disclosure Scotland and receive information from them, but we do not have a formal MOU with them. The feasibility of implementing a formal relationship will be explored.</p>	<p>Action Owner: Roy Dunn Completion date: 31 July 2022</p>	<p>Revised due date: September 2023</p>	<p>Last contact with Disclosure Scotland was in July 2023 where a decision on whether to pursue an MoU has yet to be taken. Chased again, early September 2023,</p>	<p>Commentary History See Appendix 1 or [PRESS]</p>
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HM External Auditor's report 2022 – Detailed control points (considered at Audit and Risk Assurance Committee and Council October 2022)

Recommendations summary

Priority	Outstanding recommendations	Status
Significant	0	Overdue 0
Important	1	On Track 1
Limited	0	Completed 0
Advisory	0	

RISK	HM Comments/Proposals	Management response	Completion Date/Status	Update for Audit and Risk Committee (November 2022)
From our review of journals, we identified that not all journals are reviewed by someone other than the poster. There is a risk that incorrect postings may be made to the nominal ledger and that these would not be identified at the earliest opportunity.	We recommend that a policy is put in place regarding journal review.	HCPC has in place a review process for all journals. The issue identified was that the journal approvals were not all electronically filed in one place and therefore could not be provided to the auditors from the system; this was partly the result of staff turnover. HCPC will consider how best to tighten up this control, by filing all journal approvals electronically in one place, or ensuring that approvals are attached to the journal on the Sage system. The Financial Control team will also undertake a periodic review of journal approvals on a sample basis.	On Track/In progress	Checks are undertaken periodically in 2023/24 on a sample basis, to ensure that robust supporting evidence is attached to journals posted on the Sage system

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Diversity Review	Jun-23	Mar-23	Nov-22	Sep-22	
<p>4 If the topics detailed above are not included in benchmarked training, staff members may not have sufficient awareness over compliance and reporting requirements in relation to ED&I, nor may they be sufficiently aware of the process of challenging and reporting inappropriate behaviour</p> <p>We recommend that management consider refreshing the ED&I training module and including the areas of good practice noted above.</p>	<p>The review of the EDI module is underway currently.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Unified Assurance Framework		Jun-23	Mar-23	Nov-22	Sep-22	
1, 2 & 3	<p>The current approach to determining the control environment in each department may mean that key aspects of the line 1 control environment is overlooked. Furthermore, lack of a Quality Framework may make it more difficult to compare the adequacy and effectiveness of controls operating across the organisation.</p> <p>1. Develop a Quality Framework that contains 'pillars' to create a standard way in which to assess the control environment across departments. These pillars could include Policies and Guidance, Induction and Training, Quality Checks / Peer Review, Continuous Improvement and Performance Monitoring, as examples (Year 1).</p> <p>2. For each pillar, design high level guidance setting out expectations for the expected controls to be captured within each pillar, including a good/better/best system of self assessment to support continuous improvement (Year 1).</p> <p>3 Ask teams to complete a self-assessment against each of the pillars, utilising the good practice guidance. Collate these responses and use them as the basis for the population of the UAF (Year 2).</p>	<p>2023-24 assurance framework has clearer delineation of the areas of mitigation/control reflecting the types of assurance, and a more consistent approach across each function. These will be refined with use in risk and assurance meetings in order to identify the most effective 'pillars' for the HCPC.</p>	N/A	N/A	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

5 & 6	<p>Failure to have an independent assessment of controls could result in an unreliable or inaccurate assessment of control adequacy and effectiveness, thus giving those charged with governance false assurance as to the efficacy of HCPC's system of governance, risk management and internal control.</p> <p>5. Following implementation of recommendations 1-4, The Quality Assurance Team should introduce a rolling programme of reviews of team assurance maps over a three-year cycle, assessing the veracity of the self-assessment statements and providing and independent assessment of the strength of the control environment (Year 2).</p> <p>6. As part of the above process, collate information on best practice observed and use this to continually improve the good practice guidance and Quality Framework (Year 2).</p>	<p>Planning for the QMS/Guidance and Process library review has started. This review will include departments providing required evidence of the documentation of processes and guidance. Public reporting is monitored as needed.</p>	N/A	N/A	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
7	<p>The organisation may exhaust a disproportionate amount of resource trying to mitigate against a risk that senior management and the Board may be willing to accept, reducing the efficiency and effectiveness of the risk management process. Our earlier recommendations to have more proactive local manager involvement in the risk, control and assurance framework could widen the disconnect with the corporate risk appetite thinking.</p> <p>7. Incorporate risk appetite into discussions around risk as part of the quarterly update process and consider whether a target risk score, linked to the organisation's risk appetite statement should be included within the Risk Register.</p>	<p>The Head of QA and CISRO continue to meet with Operational Risk Owners, to capture information around assurance and risk. This also assists the development of robust a SRR.</p>	N/A	N/A	N/A	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Registrant Forecasting Review	Jun-23	Mar-23	Nov-22	Sep-22	
<p>2 Where updates made to the assumptions applied within the model are manually updated within the output report there is a risk that errors and conflicting numbers are produced which can result in ambiguity as to which is the correct data and thus the accuracy of the registrant numbers being produced which ultimately are used for decision making purposes.</p> <p>We recommend that a method of cross-referencing is considered between the output report generated by the model and the inputs section, to prevent users from potentially being misled.</p>	<p>We are testing different method of reconciling input parameter and output in the model and hope to find robust and reliable methodology that can be automated by end Sep 23 and depended on successful delivery of BC Re-implementation</p>	<p>This process will fully be in place by end of March 2023 (JA)</p>	<p>N/A</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

<p>4 Where there is manual intervention, for example extracting the number of registrants from the model and importing into the Financial model there is a risk that errors arise which can ultimately affect decision making and further numbers generated.</p> <p>4. a) Investigate whether it is possible to do an automated upload from the model into the Financial model. If this is not possible, consider whether the model can be adapted to include what is required for the Financial model with less manual intervention. A secondary check should be undertaken for all data extracted from the model that is incorporated into the Financial model to verify accuracy.</p> <p>4. b) Consider if it is possible to incorporate and thus easily identify from the model the number of registrants on discounted registrant fees and those on full registrant fees to support the Finance team further.</p>	<p>Await to see what BC Re-implementation offers by end Sep 23</p>	<p>Secondary sample check about 10% are now implemented on an ongoing basis. Automated upload and incorporating registrants fee type are still work in progress, the model will need to be re-engineered to accomodate this. (JA)</p>	<p>N/A</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
<p>5 Variances in registrant data may go undetected, which may result in model adaption not made and/or investigation into variances not taking place</p> <p>We recommend that the Forecasting team check whether the variance analysis built into the model operates as intended.</p>	<p>Business Central still under construction, update likely after Sep 2023</p>	<p>This is still under construction.</p> <p>We aim to complete by on or around end of September 2023 after go-live for new BC Re-implementation. (JA)</p>	<p>N/A</p>	<p>N/A</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Education Standards	Jun-23	Mar-23	Nov-22	Sep-22	
<p>1 Key Risk Area 1: Suitable organisations are appointed to deliver educational programmes</p> <p>HCPC should continue to keep the standards under review and provide an annual update to the Education and Training Committee highlighting any issues which have arisen that could prompt an interim review mid-cycle.</p>	<p>The SETs review is still planned to begin in Q4 of this financial year</p>	<p>SETS review pushed back due to other priorities (fees, SCPEs review) and team capacity. Due to commence Q4.</p>	<p>Early planning for SETs review not due until the end of the year.</p>	<p>Early planning for SETs review not due until the end of the year.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

HCPC Intelligence Gathering	Jun-23	Mar-23	Nov-22	Sep-22	
<p>4 Key Risk Area 1: Strategy and Governance 1.2 Data strategy – data platform approach</p> <p>Decisions need to be made formally on what data analysis work is done using the front line systems such as registration & FTP and that drawn from the new data platform. Some data may be available 'self-service' and other will need analysis work.</p>	<p>To date, the Programme for Data Excellence has delivered the HEE data sharing project; a unified EDI dataset now being used for public facing analyses; a number of other analytical datasets including for renewals; some aspects of FtP; annotation and modalities; better geocoding to enable place-based analyses and on-going documentation and data quality work. A technical review is underway with our new specialist data partner, Adatis, which will lead to an updated technical roadmap for the data platform.</p> <p>A project proposal was submitted through the investment programme process for taking forward the work in 2023-24. Although the need for this work was acknowledged, the project was deemed to be unaffordable unless and until a fee increase is secured. Work will continue on the data platform utilising existing resources, but will of necessity be at a slower pace and with less certainty over timescales.</p> <p>A cross-organisation workshop was held in May to prioritise data and analytical tasks, which produced a prioritised list with automation of FTP reporting identified as the main priority for 2023-24. This priority list will be updated as necessary to reflect evolving organisational requirements.</p>	<p>During 2022-23, the focus of the PDE work was on the HEE project deliverables and on EDI, as well as creating the core infrastructure needed for the data platform. Solutions are now in place in the data platform that deliver the HEE and EDI requirements. Work on Renewals is currently underway as the next agreed priority.</p> <p>A project proposal was submitted through the investment programme process for taking forward the work in 2023-24. Although the need for this work was acknowledged, the project was deemed to be unaffordable unless and until a fee increase is secured.</p> <p>Work will continue on the data platform utilising existing resources, but will of necessity be at a slower pace and with less certainty over timescales. Nevertheless an indicative plan has been drawn up, which prioritises the automation of existing FTP reporting to improve efficiency and resilience.</p>	<p>A new Programme for Data Excellence project board has been established, chaired by the Exec Director of Professional Practice and Insight. Part of the remit of this group is to review and prioritise the requests for new data and analyses that form the development backlog for the modern data platform and analytical tools that is being developed. The data platform is being developed incrementally in accordance with the priorities agreed through the PDE board.</p>	<p>An investigation has been undertaken into the current approach to CPD reporting which concluded there was no need to alter the approach until such time as the wider CPD policy review has been undertaken. An updated version of the FtP and EDI analysis is expected to be presented to ELT in September.</p>	<p>To return to the main Summary and Tracker Scroll up or [PRESS]</p>

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Registration Payment Process		Jun-23	Mar-23	Nov-22	Sep-22	
<p>2 Key Risk Area 2: Systematic issues from the 2020/21 financial reporting exercise have been cleared</p> <p>A long-term solution systems-based solution should be introduced which eliminates, as much as reasonably practicable, the requirement for complex monthly reconciliations and manual journal postings to HCPC's finance system.</p>	<p>We have now concluded the Vision & Validate phase of the project, which resulted in additional workshops and reviews. This has had a knock-on effect on the original go-live date of July 2023 with a revised provisional go-live date of November 2023. We are in discussions with our current supplier to agree the proposed project timelines.</p>	<p>We are currently in the Vision and Validate process which should be finalised by 10/03/2023. The next step will be to conduct a UAT test for the new Business Central environment, followed by data migration and go live. Provisional go live date is now JULY 2023</p>	<p>The retendering process has now been completed and a preferred supplier identified. Contract negotiations are under way and initial steps towards formulating a project plan have commenced. The objective is to have a single finance system in place by 31 March 2023. Data cleansing of the existing system is ongoing. System-based solution to monthly income reconciliation will be incorporated into the new finance system. The deferred income model is in-scope as part of our BC Re-implementation.</p>	<p>The retendering process has now been completed and a preferred supplier identified. Contract negotiations are under way and initial steps towards formulating a project plan have commenced. The objective is to have a single finance system in place by 31 March 2023. Data cleansing of the existing system is ongoing.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>	

Appendix 1 - Commentary History - a log of the last 4 Audit and Risk Assurance Committee updates

Safeguarding controls	Jun-23	Mar-23	Nov-22	Sep-22	
<p>4 Key Risk Area 2: Guidance to registrants on standards and safeguarding risks</p> <p>HCPC should develop a suite of safeguarding materials aimed at assisting registrants manage key safeguarding risks which they may encounter during the course of their professional roles. These materials should be readily available to registrants through HCPC's website. This should be benchmarked against the safeguarding materials provided by other healthcare professions regulators.</p> <p>HCPC should also consider delivering specific safeguarding guidance sessions as part of the programme of Professional Liaison Service webinars.</p>	<p>Policy RG: Consultation on SCPE review launched in March, closes on 16 June. Consultation on guidance scheduled for Q4.</p> <p>KT - 3 #myhpcstandards have been delivered so far. The new website materials are in development.</p> <p>TG: Comms plans in place to support development, delivery and promotion of: #myhpcstandards webinars and new supportive content SCPE consultation activities and content</p>	<p>Policy RG: Work continuing on the SCPE review with draft consultation going to Council in March 2023. This will inform later consultation on safeguarding guidance currently scheduled for launch end Q3 2023-24.</p> <p>KT: Plans to deliver five #myhpcstandards webinars from April to July 2023 focused on the revised Standards of proficiency. These will include changes made to wording related to safe guarding</p> <p>TG: Comms plan in place to support delivery and promotion of upcoming webinars and supportive content relating to the new standards, including on the safeguarding</p>	<p>Policy: Work on the SCPE review has commenced, with consultation on the SCPEs due in January and a further consultation on Guidance relating to the SCPEs to follow afterwards.</p> <p>KG: #myhpcstandards webinar on safeguarding was delivered on 21 September 2022. 222 registrants attended and 95% rated the webinar as good and above in the evaluation form.</p> <p>TG: Promoting and supporting #myhpcstandards webinars, including those on safeguarding. Review and updates to safeguarding content in 2022/23 comms workplan</p>	<p>Policy - Review/updating of safeguarding materials to be included within SCPE guidance review. Work to commence on the guidance review in Q3/Q4 2022.</p> <p>KG - #myhpcstandards webinar on safeguarding will be held on 21 September 2022</p> <p>TG – Promoting and supporting #myhpcstandards webinars, including those on safeguarding. Review and updates to safeguarding content in 2022/23 comms workplan.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>
<p>6 Key Risk Area 4: Controls to identify safeguarding issues identified through DBS</p> <p>HCPC should explore the feasibility of having a formal relationship with Disclosure Scotland as it currently has with the DBS, whereby the DBS proactively alerts the HCPC of registrants who have been arrested or convicted for a serious criminal offence.</p>	<p>Disclosure Scotland were attempting to get back to HCPC in March, however nothing to date. Now indicating will respond by mid June.</p>	<p>Chased in November, there are no outstanding requirements from HCPC, just awaiting their (Disclosure Scotland) response as of 4th November 2022.</p>	<p>Still awaiting response for Disclosure Scotland, will chase contact imminently.</p>	<p>The Disclosure Scotland template has been populated by HCPC, and we await a final version for validation and signature.</p>	<p>To return to the main Summary and Tracker Scroll up or</p> <p>[PRESS]</p>