

## CQC Strategic and Operational Risk Register 2016-17

	Oversight /Owner	Description of Risk 2016-17	Pre Impact	Rating Likelihood	Rating	Controls and mitigations * *Specific actions continue to be refined and embedded into business plans during Q1.	Current Impact	Rating Likelihood	Rating	Confidence in ability to manage
<b>Strategic risks (and Strategy priorities)</b>										
<b>Priority 1. Encourage improvement, innovation and sustainability in care</b>										
SR1	RGC  CIs	<p>Risk that we do not have <b>impact</b> and are unable to <b>encourage improvement</b></p> <ul style="list-style-type: none"> <li>A significant (but not only) reason for this materialising is that reduced budgets in Health and Social Care add pressure on providers aiming to achieve improvements in quality, leading to deterioration in quality of services</li> <li>We do not effectively engage with people to ensure we reflect their views about the quality of care, or engage with stakeholders so we can share information in order to address poor care and promote improvement</li> </ul>	4 – high	4 – high	16 – high	<p><b>Controls</b> – Evaluation programme, VFM self-assessment, Quality management, Corporate performance reporting, Provider feedback and guidance, Enforcement policy</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>Demonstrate impact through national reports – State of Care, Annual report and Impact &amp; VFM report; engage with the public, providers and stakeholders, building confidence</li> <li>Demonstrate improvement through ratings changes</li> <li>Review of the action we are taking where we have concerns about providers – including re-ratings outcomes, long term breach, volumes entering and leaving special measures, and when MI becomes available in 2016, enforcement outcomes.</li> <li>Monthly meetings with trade associations</li> <li>engage with people to ensure we reflect their views about the quality of care, including in CQC Insight, engage with stakeholders so we can share information in order to address poor care and promote improvement</li> </ul>	4 – High	3 – Medium	12 – Medium	Medium
SR2	ACGC  All ET	<p>Risk that we are unable to <b>deliver our programme of public commitments</b> as a result of capacity issues arising from the reduction of our budget, or the impact of reduced budgets in care services leading to higher levels of risk than we are able to effectively monitor and act upon within our budget</p>	5 – Very High	4 – High	20 – High	<p><b>Controls</b> – Accountability to Department of Health, Objective setting, Corporate and sector performance reporting, Business and resource planning</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>Ongoing business improvement actions relating to systems and processes</li> <li>Quarterly reviews of business plans to identify level of risk to delivering 2016/17 commitments</li> <li>Continue to develop the performance information which directorates need to understand delivery (Enforcement and others)</li> <li>Directorates and ET tracking of performance, budget spend and income and turnover and vacancies</li> </ul>	4 – High	3 – Medium	12 – Medium	High
SR3	ACGC  All ET	<p>NEW Risk that a <b>change of external environment</b> in health and social care or more widely could have implications for CQC's role</p> <ul style="list-style-type: none"> <li>Change of policy environment leading to reconsideration of approach to regulation of Health and Social Care services</li> <li>CQC's clarity of purpose becomes undermined</li> </ul>	4 – high	4 – high	16	<p><b>Controls</b> - Board representing CQC with senior stakeholders, including Ministers and MPs; Senior engagement with Department of Health; Horizon scanning by Policy &amp; Strategy; Work with partners and other stakeholders; Working with other regulators</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>Ongoing engagement with a range of organisations as part of 2016-21 Strategy roll out</li> </ul>	3 – high	3 – high	9 – medium	Low

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		with other bodies and regulators in the system				<ul style="list-style-type: none"> <li>Delivering our public engagement activity</li> <li>Demonstrate impact through national reports – State of Care, Annual report and Impact &amp; VFM report; engage with the public, providers and stakeholders, building confidence</li> </ul>				
SR4	RGC ACGC  Director of S&I	Risk we are unable to deliver the changes set out in our <b>Strategy</b> due to being unable to agree or deliver joint approaches with partner organisations	5 – Very High	3 – Medium	15 – medium	<b>Controls:</b> Clear Strategy, MOUs and agreements with partners, FYFV  <b>Mitigating actions:</b> Consultation on Strategy, sharing draft Strategy with partners mentioned in it and other ALBs Ongoing work with partners to implement the Strategy	4 – Medium	3 – medium	12 – medium	Medium
<b>Priority 2. Deliver an intelligence-driven approach to regulation</b>										
SR5	RGC  CIs + c Dir S&I	Risk that we do not effectively collect or process the <b>information</b> we need to be an effective risk based regulator and accurately predict quality	4 – High	3 – Medium	12 – Medium	<b>Controls –</b> Information sharing agreements, Work with partner organisations, Customer Service Centre, External engagement, measuring and reporting on impact and quality  <b>Mitigating actions:</b> <ul style="list-style-type: none"> <li>Mapping information flows across the organisation</li> <li>Development of CQC Insight</li> <li>Improvements to provider information return</li> <li>Development of Provider Portal to collect provider information.</li> <li>Continued improvements in handling concerns information</li> <li>Demonstrate impact through national reports – State of Care, Annual report and Impact &amp; VFM report; Engage with the public, providers and stakeholders, in order to maintain and build confidence as we implement our Strategy including using data to calculate risk and direct our inspection activity.</li> </ul>	4 – High	2 – Low	8 – Medium	Medium
<b>Priority 3. Promote a single shared view of quality</b>										
		See SR4 above								
<b>Priority 4. Improve our efficiency and effectiveness</b>										
SR6	ACGC  Exec Dir CCS	Risk that we do not have the <b>skills and capability</b> we need to be able to regulate effectively.  (Links to OR4 – Risk that we do not have the <b>capacity</b> we need to deliver our commitments)	5 - Very High	4 - High	20 - High	<b>Controls -</b> Workforce planning, Skills assessment, Academy provision of learning and development, Quality management to identify skills gaps, Performance reviews  <b>Mitigating actions:</b> <ul style="list-style-type: none"> <li>Academy programme amended based on emerging priorities</li> <li>Refreshed training in inspection directorates</li> <li>Management and leadership development programme</li> <li>Development of a Talent Management Strategy</li> </ul>	4 - High	3 - Medium	12 - Medium	Medium

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SR7	ACGC All ET	Risk that we are not developing a high performing <b>culture</b> and embedding our <b>values</b> .	5 - Very High	3 - Medium	15 - Medium	<p><b>Controls</b> - Values based communications; Performance management system, including daily feedback between staff; highlighting positive behaviours; training and development; how we recruit.</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>Annual performance reviews to assess values and behaviours and proactively manage poor performance</li> <li>Others?</li> </ul>	4 - High	2 - Low	8 - Medium	High
SR8	ACGC Exec Dir S&I	Risk that if we are not able to <b>report</b> or <b>understand</b> our performance we will not take corrective action when we need to.	5 - Very High	3 - Medium	15 - Medium	<p><b>Controls</b> - Key performance indicators, Internal and external audit, Quality management, ET and Board performance reporting, Information systems development</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>Audits to assess how performance information supports decision making (<i>All directorates, through in-year audit programme</i>)</li> <li>Improvements to completion of CRM system to record activity (<i>Inspection directorates, On-going</i>)</li> <li>Ongoing data cleanse and data quality activity (<i>PPP, Intelligence</i>)</li> <li>Cleanse of core people and finance data (<i>CCS - People and FCI, On-going</i>)</li> </ul>	4 - High	2 - Low	8 - Medium	High
<b>High level Operational risks (and Business plan priorities)</b>										
<b>Priority 1 Deliver our approach to regulation</b>										
OR1	RGC C.I.s	<p>Risk that we do not <b>regulate effectively</b> and make timely, legal regulatory decisions</p> <ul style="list-style-type: none"> <li>we fail to engage with people or stakeholders</li> <li>challenges to ratings are upheld because we are not following our processes correctly</li> </ul>	4 - High	3 - Medium	12 - Medium	<p><b>Controls</b> - Scheme of Delegation, Clear Operating Model, Guidance, Quality management, Legal support, Enforcement policy, Inspector training, Appeals process</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>Engaging with people to ensure we reflect their views about the quality of care, engaging with stakeholders so we can share information in order to address poor care and promote improvement</li> <li>Identify any skills gaps as part of quality management arrangements (<i>Inspection Directorates, On-going</i>)</li> <li>Online training sessions on fundamental standards (<i>Inspection Directorates and GLS, On-going</i>)</li> <li>Improved process for considering written representations (<i>Inspection Directorates</i>)</li> <li>Scheme of Delegation improvement action plan delivery Q1/2</li> <li>Improvements to management information on enforcement decisions taken and timeliness (<i>GLS and PPP, Q1</i>)</li> </ul>				

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OR2	RGC C.I.s and Exec Dir CCS	Risk that we do not <b>respond quickly</b> and effectively to public concerns	5 - Very High	4	20 - High	<p><b>Controls</b> - NCSC processes for dealing with information of concern brought to us by the public and staff within provider organisations (referred to as whistleblowers), Enforcement policy, Responsive inspection, Registration processes. Engagement strategy and mechanisms.</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>· Responsiveness to safeguarding alerts and concerns and completion of mandatory actions remains a key KPI and is constantly monitored, performance sub group of Safeguarding committee in place (<i>Inspection directorates</i>)</li> <li>· Completion of the Responding to Concerns programme (CCS - CSS)</li> <li>· Improved monitoring of unregistered providers)</li> <li>· Restructured complaints function implementation</li> <li>· Engaging with people so they know who we are and what we do and how to speak to us</li> </ul>	4 - High	3 - Medium	12 - Medium	Medium
OR3	RGC C.I.s	NEW Risk that we do not <b>publish information</b> in our inspection reports in a timely way	4 - High	4 - High	16 - High	<p><b>Controls:</b> Inspection reports KPIs for all sectors from 2016 phased during 2016-17 or from April depending on sector</p> <p><b>Mitigating actions:</b></p> <p>Hospitals report and evidence management project delivered</p> <p>Monitoring of performance information at Directorate, ET and Board levels</p>	4 - High	2 - low	8 - medium	High
<b>Priority 3 – Build an effective; efficient; learning and values based CQC</b>										
OR4	ACGC Exec Dir CCS	Risk that we do not have the <b>capacity</b> we need to deliver our commitments, <ul style="list-style-type: none"> <li>• turnover remains high (although within sector norms) and/or</li> <li>• we are unable to recruit to areas where resource is needed or</li> <li>• we do not manage our enhanced recruitment controls in a way that recognises priorities correctly</li> </ul>	4 - High	3 - Medium	12 - Medium	<p><b>Controls</b> - Workforce planning, Clearly defined recruitment and selection process, enhanced Flexible workforce model, Monitoring turnover</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>· Recruitment and selection policy in place</li> <li>· Improve analysis of reasons for staff departures particularly staff here for less than a year, including improving exit interview take up</li> <li>· Enhanced recruitment controls managed by ET - <i>ongoing</i></li> </ul>	4 - High	3 - Medium	12 - medium	High
OR5	ACGC All ET	NEW Risk that we are unable to <b>manage our costs</b> within our reduced budget and we overspend our budget <ul style="list-style-type: none"> <li>• Payment of fees not made in a timely way leading to a budget deficit</li> </ul>	4 - High	4 - High	16 - High	<p><b>Controls:</b> Budget has been set for 2016-17, capital allocation is considered to be adequate</p> <p><b>Mitigating actions</b></p> <p>Budgetary, including recruitment controls introduced and tracked regularly by Directorates and at ET and Board</p>	4 - High	2 - Low	8 - Medium	High

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OR6	RGC Exec Dirs S&I and CCS	Risk that our methodologies, infrastructure, systems and processes are not well <b>designed</b> and are difficult to operate, or they are insufficiently flexible/ take too long to adapt to changes in our Strategy	4 - High	4 - High	16 - High	<p><b>Controls</b> - Change control process and governance, Engaging operational staff in changes, Change and project management capability, Investment Committee approval of business cases</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>· Develop approach to change management</li> <li>· Determine change projects and introduce Gateway approvals process</li> <li>· Implementation of Knowledge and Information Strategy</li> <li>· Improvement in capital programme monitoring and business case development</li> <li>· Further development of CQC Operating</li> <li>· Implement changes to customer support Model services model after independent review by 4OC</li> </ul>	4 - High	3 - Medium	12 - Medium	Medium
OR7	ACGC Exec Dir CCS	Risk that we do not <b>manage procurements</b> well or get best <b>value for contracts</b>	4 - High	4 - High	16 - High	<p><b>Controls</b> - Procurement advice and support, Adherence to DH controls, Procurement policy and handbook, Improved contract design, contract management and monitoring</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>· Procurement handbook embedding</li> <li>· Training for contract managers</li> <li>· Improved contract monitoring arrangements and reporting of contract savings and efficiencies</li> </ul>	4 - High	3 - Medium	12 - Medium	High
OR8	ACGC Exec Dirs CCS S&I	Risk that we are not protecting or securely managing our <b>information</b> effectively in accordance with regulatory requirements, agreed standards and legislation	4 - High	3 - Medium	12 - Medium	<p><b>Controls</b> - Information management and governance policies, Induction and awareness training, Access and security controls, Senior Information Risk Owner supported by the Information Governance Group (IGG), Internal audit programme</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>· Completion of annual information governance assessment</li> <li>· Audits to test effectiveness of ICT controls</li> </ul>	4 - High	3 - Medium	12 - Medium	High
<b>Priority 4 – Demonstrate the difference we make</b>										
OR9	ACGC All ET	Risk that we are not able to measure our <b>costs</b> and <b>demonstrate better efficiency and value for money</b> to providers and other stakeholders.	4 - High	4 - High	16 - High	<p><b>Controls</b> - Robust approach to assessing impact, Challenge to budget holders, Financial controls, Fees strategy, VFM self-assessment</p> <p><b>Mitigating actions</b></p> <ul style="list-style-type: none"> <li>· Improvement in financial reporting</li> <li>· Improved understanding of the cost of delivery</li> </ul>	4 - High	3 - Medium	12 - Medium	High

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					<ul style="list-style-type: none"> <li>Develop impact/VFM report and respond to NAO report findings</li> <li>Engage with providers via Fees Advisory Panel and other meetings to explain how we measure and evaluate costs and translate those into fee changes</li> <li>Demonstrate impact through national reports – State of Care, Annual report and Impact &amp; VFM report; engage with the public, providers and stakeholders, listening to concerns and building confidence</li> </ul>				

**Strategic risks** are those that would prevent us delivering our purpose.

**High level operational risks** are those that are likely to have implications for a number of different directorates in CQC or which have been escalated by directorates.