

NIPEC Corporate Risk Register 2024-25

1. Purpose of this report:

The purpose of this report is to provide NIPEC Business Team with an update on Version 5 of the Corporate Risk Register 2024-25.

2. Action Required

Risks 1, 2, 3 and 5 have been updated.

NIPEC Business Team are asked to note the changes and approve Version 5 of the 2023-24 Corporate Risk Register.

RISK 1					
NIPEC is unable to fully achieve its business objectives as stated in the NIPEC Business Plan 2024-25					
Impact Score	4 (Major)	Risk Owner(s)	Chief Executive/SMT	Date Added to Register	2nd May 2023
Likelihood Score	4 (Likely)	Risk Appetite	Cautious	Target Date Action Completion	March 2025
Current Classification	High (16)	Category	Performance	Target Score/Classification	Low
Controls	<ul style="list-style-type: none"> Progress on corporate and professional objectives are reviewed by Council and the senior team as follows: <ul style="list-style-type: none"> - At Business and Professional Team meetings every 6 weeks; - Professional & Business Committee are responsible for monitoring progress on professional rag rated workplan objectives and providing assurance to Council on achievement of professional objectives; - Audit & Risk Committee are responsible for monitoring progress on corporate governance objectives and providing assurance to Council that these are being met; - A RAG rated professional workplan and corporate governance objectives update are presented to each Council meeting; The Chief Executive monitors progress on individual objectives at 1:1 meetings which take place every 6 weeks; NIPEC report progress on objectives at Sponsor Branch, Ground Clearing and Accountability meetings; The Chief Executive reports progress/delays to the Chief Nursing Officer at their 1:1 meeting. 				
Gaps in Control	<ul style="list-style-type: none"> Limited use of Associates due to constraints in NIPEC Budget allocation/delay in availability of slippage to allow early engagement of associates; NIPEC's Professional Workplan to be reviewed and updated in terms of setting completion timelines for projects. 				

BUSINESS OBJECTIVE GOVERNANCE AND PERFORMANCE

Sources of Assurance	<ul style="list-style-type: none"> • Annual Report and Accounts; • Mid-year Assurance report; • Performance Reports against Business Plan / Professional Workplan to NIPEC Council and Committees; • CEX update report to Council; • Assurance Maps action plan and progress updates to Audit & Risk Committee; • Annual Quality report.
Gaps in Assurance	<ul style="list-style-type: none"> • Prioritisation of Projects for the 2024-25 year.
Impact of Risk	<p>Business Objective: Governance & Performance Failure to achieve objectives in the current climate may result in NIPEC being unable to demonstrate value for money and our added value to the HSC system. It may also limit opportunities to participate in other areas of work.</p>
Actions taken to date	<p><u>April 2024:</u></p> <ul style="list-style-type: none"> • Available resources (Associates) agreed and allocated to project leads where funding permitted; • Draft budget prepared and mitigations in place in relation to challenges of forthcoming budget forecast. <p><u>May 2024:</u></p> <ul style="list-style-type: none"> • Joint engagement event took place with CNO Directorate and PHA Nursing colleagues 13th May 2024 to discuss priorities for the year ahead. <p><u>June 2024:</u></p> <ul style="list-style-type: none"> • Completion of Senior Team’s appraisals and personal development plans; • Audited ‘Clean’ Annual Report & Accounts 2023-24 approved by Audit & Risk Committee on 26th June 2024. <p><u>July 2024:</u></p> <ul style="list-style-type: none"> • Audited ‘Clean’ Annual Report & Accounts 2023-24 approved by Council on 1st July 2024; • Opening allocation letter received from DoH Finance;

BUSINESS OBJECTIVE GOVERNANCE AND PERFORMANCE

- Appointment of Committee Secretary (band 5) on 22nd July 2024.

September 2024:

- Appointment of Project Support Officer (band 4) 9th September 2024 bringing NIPEC back to full funded establishment of staff.
- Professional & Business Committee met 6th September 2024: focus of agenda was review of the Professional Workplan and progress on updates to better reflect performance achievement of objectives with timelines.

October 2024:

- Two Business Planning days organised with NIPEC' senior team on 19th and 29th November to look at business priorities for 2025-26 and develop a Business Plan.

December 2024

- Business and Professional Committee met on 29th November and reviewed the professional workplan, progress on objectives and NIPEC's Performance Management Framework.
- The professional workplan and corporate objectives were reviewed at Council in December 2024.
- Business Planning workshop setup for 2025.

Future Actions

January 2025 to March 2025:

- Ongoing monitoring of progress objectives by BTM, PTM, Professional & Business Committee and Council;
- Monthly monitoring of budget and using slippage where available to increase capacity;
- Mid-year review of Senior Team's appraisals and personal development plans;
- Chief Executive to monitor progress of individual objectives at senior team 1:1 meeting;
- Reporting of progress to Sponsor Branch, Ground Clearing & Accountability meetings;
- Presentation of individual NIPEC projects to Council meeting to remain a standing agenda item;
- Working together to increase capacity within current budget.
- Temporary cover for Chief Executive's PA to commence on 8th January 2025.

RISK 2 Risk to NIPEC’s ability to achieve financial breakeven due to a reduction in NIPEC’s financial allocation for 2024-25					
Impact Score	4 (Major)	Risk Owner(s)	Chief Executive/SMT	Date Added to Register	2 nd May 2023
Likelihood Score	3 (Possible)	Risk Appetite	Cautious	Target Date Action Completion	March 2025
Current Classification	High (12)	Category	Performance & Reputational	Target Score/Classification	Low (4)
Controls	<ul style="list-style-type: none"> NIPEC prepared a draft 2024-25 budget based on a flat cash allocation; Confirmation of flat cash allocation received 9th July 2024; Limited discretionary spend to remain in place; Limits in place regarding use of NIPEC’s Associate list based on funds being available; Monthly budget monitoring meetings with BSO to track expenditure; Submission of monthly Financial Monitoring Return (FMR) to DoH Finance; BSO Annual Finance SLA. 				
Gaps in Control	<ul style="list-style-type: none"> Potential request for further savings from DoH. 				
Sources of Assurance	<ul style="list-style-type: none"> Reporting of financial position to Business Team, A&RC and Council; ‘Clean’ Annual Accounts for 2023-24; Financial Management Internal Audit 2024-25; Quarterly assurance from BSO Finance that all objectives in SLA carried out. 				
Gaps in Assurance	None identified.				

<h3>RISK 2</h3>	<p>Risk to NIPEC’s ability to achieve financial breakeven due to a reduction in NIPEC’s financial allocation for 2024-25</p>
<p>Impact of Risk</p>	<p>Business Objective: Finance & Governance Failure to achieve financial breakeven may impact NIPEC’s ability to deliver objectives, both from a financial and recruitment perspective. As financial breakeven is a mandatory requirement, failure to achieve it may damage NIPEC’s reputation.</p>
<p>Actions taken to date</p>	<p><u>April 2024:</u></p> <ul style="list-style-type: none"> • Preparation of a 2024-25 draft budget with implications of various savings scenarios included; • Regular updates to Senior Management Team and Business Team meetings; • Update to NIPEC Council at its March 2024 meeting; • Business Case submitted to NIPEC’s Sponsor Branch requesting funding for the Ethnic Diversity Officers to March 2025. <p><u>May 2024:</u></p> <ul style="list-style-type: none"> • Budget position discussed at Ground Clearing meeting May 2024. <p><u>June/July 2024:</u></p> <ul style="list-style-type: none"> • Head of Corporate Services attended quarterly Finance Forum to receive an update on the HSC budget position; • Sign-off of Annual Report & Accounts 2023-24 by Audit & Risk Committee and Council. <p><u>July/August 2024</u></p> <ul style="list-style-type: none"> • Months 3 and 4 FMR submitted to DoH Finance with a projected breakeven position at year end.

	<p><u>September/October 2024:</u></p> <ul style="list-style-type: none"> • Submission of months 5 and 6 FMR to DoH Finance. Month 06 showing a small surplus and consideration to be given in Month 7 to request a small retraction to bring NIPEC back within projected breakeven position; • Additional Associates appointed to support professional projects between October 2024 and March 2025; • Additional allocation of funds (ring-fenced) for the Ethnic Diversity Officers' project. <p><u>November/December 2024:</u></p> <ul style="list-style-type: none"> • Retraction of £25k submitted to DoH in Month 8 and accepted. • Update on financial position presented to Business Team and Council.
<p>Future Actions</p>	<p><u>January 2025 to March 2025:</u></p> <ul style="list-style-type: none"> • Consideration to be given to a small retraction of funds in Month 7 to bring NIPEC back within a projected breakeven position; • NIPEC to draft a 3-year budget projection for 2025-25 – 2027-28 based on flat cash/1% efficiency and return to DoH by 29th November 2024; • Use of NIPEC Associates to be monitored to ensure that NIPEC's budget does not become over/under-committed; • Monthly budget meetings scheduled to take place with BSO Finance to monitor expenditure; • Submission of monthly FMR to DoH Finance; • Head of Corporate Services to attend DoH Finance Forum; • Financial reports to be presented to Business Team, A&RC and Council meetings; • Ensure all NIPEC staff are regularly updated and fully aware of the budget position.

RISK 3 Failure by NIPEC to have a sufficiently tested organisational Business Continuity Plan in place to support ongoing delivery of services, including in the event of a cyber-security attack that results in the unavailability of systems that facilitate HSC services.					
Impact Score	3 (Moderate)	Risk Owner(s)	Chief Executive/SMT	Date Added to Register	2 nd May 2023
Likelihood Score	2 (Unlikely)	Risk Appetite	Cautious	Target Date Action Completion	March 2025
Current Classification	Medium (6)	Category	Performance & Reputational	Target Score/Classification	Low (4)
Controls	<ul style="list-style-type: none"> • A Council approved Business Continuity Plan is in place. It is a 'live' document and is reviewed at least annually; • NIPEC Chief Executive and Head of Corporate Services have a hard copy list of contacts in order that they can contact Council members and staff in the event of a cyber-attack and keep them up to date; • All NIPEC staff have remote access and can work from home in the event that James House offices become unavailable; • Business Continuity and Cyber-security training provided to Council members and staff; • All staff are required to complete Cyber-security e-learning programme; • NIPEC/Regional ALBs continue to be represented on regional Cyber Programme by Head of ITS; • To mitigate potential absence which may impact achievement of objectives, two Senior Professional Officers nominated for significant professional projects, one as the lead and one to shadow. 				
Gaps in Control	<ul style="list-style-type: none"> • Personal contact details for key NIPEC staff maintained by BSO not up to date; • Training not attended or up to date; • Potential delays in communication by BSO ITS in the event of a cyber security attack on HSC. 				

RISK 3 Failure by NIPEC to have a sufficiently tested organisational Business Continuity Plan in place to support ongoing delivery of services, including in the event of a cyber-security attack that results in the unavailability of systems that facilitate HSC services.	
Sources of Assurance	<ul style="list-style-type: none"> • Internal Audit 2024-25 of NIPEC’s Business Continuity Planning arrangements – satisfactory assurance received; • BSO ITS SLA including Cyber-security; • Head of BSO ITS Annual Report shared with Council members; • BSO Annual Governance Statement presented to A&RC; • Testing of NIPEC Business Continuity Plan.
Gaps in Assurance	<ul style="list-style-type: none"> • Reports from BSO on their Business Continuity testing and outcome/mitigations for Audit & Risk Committee; • Arrangements for BSO to contact NIPEC in the event of a cyber-attack not in place; • Lack of clarity on arrangements for Payroll, HR, IT and Payments’ services (all BSO) in the event of a cyber-attack on HSC; • Testing of NIPEC’s Business Continuity Plan not completed in James House.
Impact of Risk	<p>Business Objective: Finance & Governance</p> <p>Inability to deliver an appropriate level of service to our service users in the event of any disruption resulting in potential performance issues and reputational damage.</p>

BUSINESS OBJECTIVE

GOVERNANCE AND PERFORMANCE

Actions taken to date

March 2024:

- Business Continuity training attended by NIPEC Senior Staff and Council members;
- NIPEC agreed the Internal Audit Plan for 2024-25 which includes an audit of NIPEC's Business Continuity arrangements.

May/June 2024

- Further meeting took place to progress Business Continuity Plan. Meeting arranged internally to draft the 2024-25 Business Continuity Plan.

July/August

- Work commenced on review of Business Continuity Plan and revisions made.

September/October 2024

- Completion of Internal Audit of Business Continuity Planning (satisfactory assurance received): outcome reported to Audit & Risk Committee in October 2024;
- Request from Head of Corporate Services to BSO Director of Customer Care for a meeting to discuss provision of assurances by BSO on their testing and audit recommendations;
- Head of Corporate Services and Business Manager attended further Business Continuity training in October;
- Revisions made to Business Continuity Plan and draft will be presented to Business Team on 12th November.

December 2024

- Revised Business Continuity Plan approved by Council and Business Team in December 2024 and circulated to key staff.

RISK 3

Failure by NIPEC to have a sufficiently tested organisational Business Continuity Plan in place to support ongoing delivery of services, including in the event of a cyber-security attack that results in the unavailability of systems that facilitate HSC services.

Future Actions**January 2025 to March 2025:**

- Business Continuity Plan to be presented to Council in March 2025 to include update on assurances from BSO;
- Request for personal contact details from Council members and staff to be issued to ensure these are kept up to date and saved in hard copy for the Chief Executive and Head of Corporate Services for use in the event of a cyber-attack on HSC;
- Recommendations from Internal Audit of NIPEC's Business Continuity arrangements to be completed and reported to the Audit & Risk Committee;
- Desk-top test of the current Business Continuity Plan to be completed in James House in February;
- Assurance to be sought from BSO that they hold personal contact details for NIPEC in the event of a cyber- attack so that information can be shared as to how staff will be paid, invoices paid and other key services will operate;
- NIPEC to follow up with BSO to seek an assurance report on Business Continuity testing.

RISK 4

Risk to the HSC network and organisations in the event of a cyberattack on HSC or a supplier/partner or organisation resulting in the compromise of the HSC network and systems or the disablement of ICT connections and services to protect the HSC and its data. The impact and residual risk on the ability of NIPEC to continue to deliver services may result in the inability to deliver the corporate objectives set down by sponsor branch.

N.B Note that this is a regional risk adopted by all HSC organisations.

Impact Score	4 (Major)	Risk Owner(s)	Chief Executive/SMT	Date Added to Register	1 st April 2021
Likelihood Score	4 (Likely)	Risk Appetite	Cautious	Target Date Action Completion	March 2025
Current Classification	High (16)	Category	Performance & Reputational	Target Score/ Classification	Medium (9)
Controls	<ul style="list-style-type: none"> Regional Cyber Boards chaired by BSO; HSC Cyber programme Board NIPEC represented by head of ITS; NIPEC representation on DOH led Information Governance Advisory Group; Risk Management Framework; Information Governance Processes & monitoring; Emergency Planning & Service Business Continuity Plans; BSO ITS Disaster Recovery Plan; Change Control processes; Data Protection legislation. 				
Gaps in Control	<ul style="list-style-type: none"> Regular cyber security reports from BSO; NIPEC reliant on BSO ITS for management of cyber security. 				

RISK 4

Risk to the HSC network and organisations in the event of a cyberattack on HSC or a supplier/partner or organisation resulting in the compromise of the HSC network and systems or the disablement of ICT connections and services to protect the HSC and its data. The impact and residual risk on the ability of NIPEC to continue to deliver services may result in the inability to deliver the corporate objectives set down by sponsor branch.

N.B Note that this is a regional risk adopted by all HSC organisations.

Sources of Assurance	<ul style="list-style-type: none"> • BSO SLA for provision of ICT; • Contract Management and Reviews; • Data Access Agreements/Memorandum of Understanding; • Supplier / Partner Frameworks; • DoH Information Governance Advisory Group; • HSC Cyber programme Board - NIPEC represented by head of ITS; • BSO Annual Governance Statement; • Regional cyber security training; • ALB Forum briefings by Head of Cyber Security.
Gaps in Assurance	<ul style="list-style-type: none"> • Regular written reporting from BSO ITS on cyber security developments.
Impact of Risk	<p>Business Objective Governance & Performance</p> <p>Causing disruption to services.</p> <p>Unauthorised access to NIPEC information resulting in a breach of regulatory compliance, statutory obligations, and the potential for fines in addition to resulting reputational damage.</p>

RISK 4

Risk to the HSC network and organisations in the event of a cyberattack on HSC or a supplier/partner or organisation resulting in the compromise of the HSC network and systems or the disablement of ICT connections and services to protect the HSC and its data. The impact and residual risk on the ability of NIPEC to continue to deliver services may result in the inability to deliver the corporate objectives set down by sponsor branch.

N.B Note that this is a regional risk adopted by all HSC organisations.

Actions taken to date

- BSO Service Continuity Plans reviewed, updated and tested against the impact of a cyber incident;
- HSC wide Incident Response test in June 2023 - 60 people in attendance (ALB's represented by BSO);
- Ongoing monthly HSC Cyber Security e-learning for all HSC staff since 2022-23.

Future Actions

- DoH Information Governance Advisory Group to develop an IG management plan in the event of Cyber incident;
- DoH Regional IG working group to be established to take forward the review of data flows from HSC/Partner organisations;
- Supplier frameworks to include Security and IG clauses, risk assessment and security management plans completed and approved by BSO Programme Board;
- Consider development and use of legally binding arrangements;
- Identify actions to support Partner/ Supplier Cyber Incident Recovery Planning (draft protocol paper shared with NIPEC). Seek written, evidenced assurances from supplier / partner on the secure transfer and storage of HSC data;
- Further assurances to be sought on the management of Information Security by BSO ITS as discussed at A&RC in February 2024.

RISK 5 NIPEC is unable to give assurance of full compliance with the legislative requirements of Public Sector Bodies Websites and Mobile Applications (No. 2) Accessibility Regulations 2018.					
Impact Score	3 (Moderate)	Risk Owner(s)	Chief Executive/SMT	Date Added to Register	2 nd May 2023
Likelihood Score	3 (Possible)	Risk Appetite	Cautious	Target Date Action Completion	March 2025
Current Classification	Medium (9)	Category	Performance & Reputational	Target Score/Classification	Low (4)
Controls	<ul style="list-style-type: none"> BSO ITS SLA; Hosting of NIPEC Corporate and Careers' Websites on WordPress Framework; BSO ITS audit of WordPress Framework; Accessibility Statement on websites; Website Governance Group. 				
Gaps in Control	<ul style="list-style-type: none"> None identified. 				
Sources of Assurance	<ul style="list-style-type: none"> BSO ITS SLA; Internal Audit advisory report 2023-24 reported to A&RC. 				
Gaps in Assurance	<ul style="list-style-type: none"> Accessibility Audit of NIPEC websites to ensure full compliance of Accessibility Legislation 2018. 				

<h3>RISK 5</h3>	<p>NIPEC is unable to give assurance of full compliance with the legislative requirements of Public Sector Bodies Websites and Mobile Applications (No. 2) Accessibility Regulations 2018.</p>
<p>Impact of Risk</p>	<p>Business Objective Governance & Performance NIPEC would not meet its legislative obligations within the Accessibility Regulations and Disability Discrimination Act. This could impact on NIPEC’s ability to show good public governance.</p>
<p>Actions taken to date</p>	<p><u>March/April 2024:</u></p> <ul style="list-style-type: none"> • NIPEC received an advisory report from Internal Audit reviewing the implementation of recommendations from the 2021-22 Internal Audit of Websites; • NIPEC’s Careers’ Website transfer to WordPress completed and the site made ‘live.’ <p><u>May 2024</u></p> <ul style="list-style-type: none"> • Web and Media Governance Group meeting took place on 21st May 2024 where accessibility is a standing agenda item; • Work is ongoing with BSO ITS in relation to accessibility requirements for both sites; • DPIA carried out on Careers’ Website; • Update provided to A&RC on progress. <p><u>June-August 2024</u></p> <ul style="list-style-type: none"> • Internal meeting held on 23rd July 2024 to discuss a plan of work to take place on NIPEC’s website to ensure full compliance with accessibility legislation; • NIPEC Senior Comms Officer and Business Manager met with BSO website team to identify areas of improvement in relation to accessibility on NIPEC website and agreement on way forward; • Research into accessibility groups to ‘test’ accessibility on the sites took place with BSO Equality Unit.

BUSINESS OBJECTIVE

GOVERNANCE AND PERFORMANCE

	<p><u>September-December 2024</u></p> <ul style="list-style-type: none"> • Meeting took place between Head of Corporate Services, Senior Communications Officer and Business Manager to progress this work; • BSO to undertake work on the website to look at information and resources featured to improve user experience, to make evidence-based improvements and to improve accessibility.
<p>Future Actions</p>	<p><u>January 2025 to March 2025:</u></p> <ul style="list-style-type: none"> • Work programme to take place to amend both websites' content to improve compliance with accessibility legislation; • Internal Website & Media Governance Group to continue to monitor governance of the 2 websites; • Implementation of recommendations from Internal Audit advisory report; • BSO work on the main website to be completed by end of December 2024; • Work planned to be undertaken with disability users to test NIPEC website by March 2024; • Further meeting setup with the Head of Corporate Services, Senior Communications Officer and Business Manager to discuss updates on the website.

Appendix A

HSC Regional Risk Matrix – with effect from April 2013
(updated June 2016 and August 2018)

Risk Likelihood Scoring Table			
Likelihood Scoring Descriptors	Score	Frequency (How often might it/does it happen?)	Time framed Descriptions of Frequency
Almost certain	5	Will undoubtedly happen/recur on a frequent basis	Expected to occur at least daily
Likely	4	Will probably happen/recur, but it is not a persisting issue/circumstances	Expected to occur at least weekly
Possible	3	Might happen or recur occasionally	Expected to occur at least monthly
Unlikely	2	Do not expect it to happen/recur but it may do so	Expected to occur at least annually
Rare	1	This will probably never happen/recur	Not expected to occur for years

Likelihood Scoring Descriptors	Impact (Consequence) Levels				
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Almost Certain (5)	Medium	Medium	High	Extreme	Extreme
Likely (4)	Low	Medium	Medium	High	Extreme
Possible (3)	Low	Low	Medium	High	Extreme
Unlikely (2)	Low	Low	Medium	High	High
Rare (1)	Low	Low	Medium	High	High

Appendix B

Setting the Risk Appetite

Risk appetite can be defined as the “*amount and type of risk that an organisation is prepared to seek, accept or tolerate.*” ISO defines risk appetite as an “*organisation’s approach to assess and eventually pursue, retain, take or turn away from risk*”. The Senior Management Team is responsible for setting the organisational attitude regarding risk and the Council is responsible for determining whether the risk attitude is aligned with the best interests of the organisation. NIPEC defines the risk appetite of the organisation as the extent of exposure to risk that is judged tolerable for it. Risk Appetite can be classified in five common classifications:¹

- **AVERSE:** Avoidance of risk and uncertainty is a key objective;
- **MINIMALIST:** Preference for ultra-safe business delivery options that have a low degree of inherent risk and may only have potential for limited reward;
- **CAUTIOUS:** Preference for safe delivery options that have a low degree of inherent risk and may only have limited potential for reward;
- **OPEN:** Willing to consider all options and choose the one that is most likely to result in successful delivery while also providing on acceptable level of reward;
- **HUNGRY:** Eager to be innovative and to choose options based on potential higher rewards (despite greater inherent risk).

¹ Adapted from *Managing your Risk Appetite – a Practitioner’s Guide*, HM Treasury 2006

Appendix C

Types of risk

NIPEC has identified four types of risk that could affect the strategic business objectives of the organisation:

- Financial:** the risk that the budget agreed may be exceeded; and/or that there is poor value for money. Also, consideration of risks in regard to regularity and propriety of public funds;
- Performance:** the risk that the outcomes for an agreed programme may not be achieved;
- Reputational:** the risk that unwanted actions of a provider may bring themselves, the programme or NIPEC into disrepute;
- Opportunity:** the risk that NIPEC or the provider, because they have not assessed risks accurately and are risk averse, decide not to take a business opportunity and so damage their effectiveness.