

Quality Assurance Directorate Risk Register - risk 1562
September 2026 update

Category	Strategic or Operational risk?	Project/ Strategy	Risk No	CCG or associated CCG risk?	Risk Manager	Risk Owner	Risk Description	Current risk score as at May 2026	Current risk score as at 24 July 2026	Risk score September 2026	Risk Narrative (September 2026)	Current Controls (from Compass)	Mitigation (from Compass)
Operational	Operational	Quality Assurance and Regulation Directorate	1562	Not CCG or associated CCG			There is a risk that the Independent Healthcare team may be unable to progress the wider preparations for the Non Surgical Procedures Act because of current resource and time constraints, resulting in failure to meet statutory requirements of the Act, potential for poor patient care outcomes and reputational risk to HIS.	Medium - 8	Medium - 8	Medium - 12	Award letter not received as yet from SG and therefore scoping not commenced and will not be concluded in Autumn as hoped. This will significantly impact phase 2 of business case and any further funding requests made and our operational or system developments required for the proposed implementation date. It is unclear as yet what any transitional arrangements from SG will be and we await further confirmation on any additional requirement/impacts on RIPSAs.	Programme governance arrangements are being developed to oversee implementation of the Non-Surgical Procedures (Scotland) Act, including regular monitoring of progress, prioritisation of key preparatory activities, and escalation of resource constraints through Directorate governance structures	External support being commissioned to scope market size and address capacity gaps, a business case progressed to the Scottish Government for pump-priming funding, and workforce planning to commence to scope the additional staffing capacity required to support delivery of the Act.