

Horizon Scanning

1.	Background At the meeting of the Board held on 7 February 2017 it was agreed that horizon scanning should be a standing item for all future Board meetings. Sections 2, 3 and 4 below include the range of issues confirmed as at 18 February 2026.
2.	Generic workplace/employment issues
2.1	Effectiveness of the Home Based Working policy Implications for CNHC: Confirm policy remains fit for purpose, supports productivity and wellbeing, and is compliant with employment/IG requirements.
2.2	Worker Protection (Amendment of Equality Act 2010) Act 2023 – employer duty to take reasonable steps to prevent sexual harassment (in force since 26 Oct 2024) Implications for CNHC: Review harassment risk assessment, training, reporting routes, and Board-level assurance.
2.3	Employment Rights Act 2025 – commencement of key reforms (including dismissal protection for taking part in industrial action becoming ‘automatically unfair’ from 18 Feb 2026; further changes expected from April 2026) Implications for CNHC: Review HR policies, manager guidance, and any industrial relations contingency planning; ensure consistent documentation and decision-making.
2.4	Data (Use and Access) Act 2025 – phased implementation of data protection/privacy changes between June 2025 and June 2026 Implications for CNHC: Update data protection impact assessments, privacy notices, retention schedules, supplier contracts, and staff training as requirements commence.
2.5	Data (Use and Access) Act 2025 – ICO governance reforms and transition to new oversight arrangements (appointments expected during 2026) Implications for CNHC: Monitor ICO guidance/expectations as the governance changes take effect and ensure CNHC information governance, DPIA processes and staff training remain current.
2.6	Equality and Human Rights Commission (EHRC) revised Services Code of Practice following UK Supreme Court ruling on the meaning of ‘sex’ in the Equality Act (16 Apr 2025) – draft code submitted to government (4 Sept 2025) and awaiting Parliamentary process/commencement date Implications for CNHC: Monitor commencement and update EDI policies, member/registrant-facing guidance, and staff training to reflect the final Code.
3.	Wider political environment
3.1	The current geopolitical crisis

	<p>Implications for CNHC: Consider continuity planning, travel/event participation risk, and impact on partners/suppliers.</p>
3.2	<p>Cyber security risks</p> <p>Implications for CNHC: Maintain cyber essentials controls, incident response readiness, and staff phishing awareness; ensure Board oversight of cyber risk.</p>
3.3	<p>Impact of cost-of-living increases</p> <p>Implications for CNHC: Monitor affordability impacts on registrant renewals and consider payment options/communications to reduce attrition.</p>
3.4	<p>UK policy and regulatory developments on AI and digital governance (including expectations of responsible AI use and transparency)</p> <p>Implications for CNHC: Establish an organisational position on AI use (including for assessment/complaints handling), update policies, and ensure transparency where AI tools are used.</p>
3.5	<p>Online Safety Act – Ofcom statutory reports due July 2026 (age assurance) and October 2026 (harmful-to-children content)</p> <p>Implications for CNHC: Review CNHC digital communications and consider light-touch guidance for registrants on safer online engagement, moderation and safeguarding messaging.</p>
3.6	<p>Potential policy changes on under-16 social media access (consultation/policy development – to monitor during 2026)</p> <p>Implications for CNHC: Keep public engagement and reputation-building plans adaptable if platform access rules change.</p>
4.	<p>Healthcare Sector-specific issues</p>
4.1	<p>Integrated Care Systems policy and prospects for integration of complementary and mainstream healthcare</p> <p>Implications for CNHC: Maintain relationships with ICS stakeholders; tailor messaging on public protection and quality to support appropriate referrals.</p>
4.2	<p>Social prescribing</p> <p>Implications for CNHC: Position CNHC registration as a quality marker for social prescribing pathways; engage link worker networks/VCSE.</p>
4.3	<p>Personal Health Budgets / Self Directed Support</p> <p>Implications for CNHC: Ensure CNHC standards are clear for commissioners and individuals purchasing services; provide simple 'what to look for' guidance.</p>
4.4	<p>Standards for the delivery of online training and assessment (including remote/AI-assisted assessment integrity)</p>

	Implications for CNHC: Work with Verifying Organisations to strengthen assessment assurance, identity checks, and malpractice controls (including AI misuse).
4.5	Outcome of 2022 government consultation (published Feb 2023) on when statutory regulation is appropriate Implications for CNHC: Track any renewed DHSC direction on regulation and prepare messaging on CNHC's role as an Accredited Register.
4.6	Draft legislation on Ending Conversion Practices in Scotland (status to monitor) Implications for CNHC: Monitor reputational/legal risk; ensure CNHC Code and complaints handling address any related concerns.
4.7	Anaesthesia Associates and Physician Associates Order 2024 (SI 2024/374) – statutory regulation by GMC; associated 'accepted outcomes' reforms in Fitness to Practice Implications for CNHC: Consider whether CNHC FtP/complaints processes should adopt similar proportionality tools; reflect PSA good practice.
4.8	Professional Standards Authority (PSA) 'Using accepted outcomes in fitness to practise' guidance (published 24 Jun 2025) Implications for CNHC: Review CNHC complaints/FtP policies and templates for alignment; evidence learning and consistency for PSA assurance.
4.9	PSA Regulatory Data and Artificial Intelligence (AI) Group – ongoing work on data/AI opportunities and risks in regulation (and related national AI policy activity) Implications for CNHC: Align data strategy and AI governance with PSA direction; strengthen data quality and reporting to support risk-based regulation.
4.10	PSA Right-touch regulation 2025 (published 7 Oct 2025) Implications for CNHC: Use Right-touch to evidence proportionate regulation, prioritise resources, and support decision-making frameworks.
4.11	PSA Strategic Plan – current plan runs 1 Apr 2023 to 31 Mar 2026; new plan for 2026 onwards to monitor Implications for CNHC: Track PSA priorities early and align CNHC strategy, reporting and stakeholder engagement to the new plan.
4.12	Advertising Standards Authority (ASA) / CAP Code – new advertising restrictions for "less healthy" food and drink from 5 Jan 2026 and continued enforcement focus on health/medical claims Implications for CNHC: Ensure CNHC communications and registrant guidance reinforce compliant advertising and health-claims practice to protect public confidence and reduce complaints/reputational risk.
5.	Current position
5.1	PSA revised Standards for Accredited Registers (publication expected early 2026) Implications for CNHC: Build a readiness plan (gap analysis, evidence pack, policy updates,

	comms) and align the 2026 work programme and Board assurance to any revised requirements.
6.	Members' action
6.1	Members are asked to discuss and agree any additions or changes to the issues listed in sections 2, 3 and 4 above.

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