

# **Risk management policy**

Version control	Date and updates	
Original	September 2019	
Version 2	December 2020: no changes	
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#### What is Risk Management?<sup>1</sup>

Risk is part of all our lives. As a society, we need to take risks to grow and develop. From energy to infrastructure, supply chains to airport security, hospitals to housing, effectively managed risks help societies achieve. In our fast-paced world, the risks we must manage evolve quickly. We need to make sure we manage risks so that we minimise their threats and maximise their potential.

Risk management involves understanding, analysing and addressing risk to make sure organisations achieve their objectives. So, it must be proportionate to the complexity and type of organisation involved. Enterprise Risk Management (ERM) is an integrated and joined up approach to managing risk across an organisation and its extended networks.

## Types of risk<sup>2</sup>

Anything that could prevent your charity achieving its aims or carrying out its strategies is a risk. The types of risks your charity might face will depend on its size, funding and activities, among other factors. Some risks charities can face include:

- damage to its reputation
- receiving less funding or fewer public donations
- losing money through inappropriate investments
- change in the government's policy on a particular issue, affecting grants or contracts

Identify any potential risks that could prevent your charity from meeting the needs of its beneficiaries, and put processes in place to assess and manage those risks.

#### How to manage risks

You are not required by law to have a risk management process for your charity, nor to follow a particular method. But the Charity Commission strongly recommends that you have a clear risk management policy and process. This will help you identify and manage all types of risks, and embed risk management into your charity's work. The commission's <u>detailed guidance on risk management</u> sets out the basics of dealing with risks. It includes a risk management model made up of the following steps:

- 1. Establish a risk policy
- 2. Identify risks
- 3. Assess risks
- 4. Evaluate what action to take
- 5. Review, monitor and assess periodically

<sup>&</sup>lt;sup>1</sup> https://www.theirm.org/the-risk-profession/risk-management.aspx

<sup>&</sup>lt;sup>2</sup> Charity Commission: <a href="https://www.gov.uk/guidance/how-to-manage-risks-in-your-charity">https://www.gov.uk/guidance/how-to-manage-risks-in-your-charity</a>



The model includes a heat map grid – this is one way to assess the impact each risk could have on your charity. Your charity should have a structured approach to risk management that is appropriate for its size and complexity. Example approaches include:

- Risk assessment toolkit KnowHow NonProfit
- Risk management standard The Institute of Risk Management

## When to report on risk management

By law, non-company charities with incomes of £500,000 or more (and charities with incomes above £250,000 plus assets worth more than £3.26 million) must include a risk management statement in their trustees' annual report. Company charities must report on their main risks and uncertainties in the directors' report (unless they are classed as a small company by law).

#### What to include in a risk management statement

Your risk management statement should include:

- an acknowledgement of the trustees' responsibility to identify, assess and manage risks
- an overview of your charity's process for identifying risks
- an indication that major risks have been reviewed or assessed
- confirmation of the systems and processes set up to manage risks

Larger charities or those with more complicated activities should provide a more detailed risk management statement.



#### **BHIVA** risk management strategy

- 1. Establish a risk policy
- 2. Identify risks
  - 2.1. Reduced income from pharmaceutical industry
  - 2.2. Cancellation of annual or autumn conference
  - 2.3. Cancellation of one-day course, such as General Medicine course
  - 2.4. Reduced income from membership fees
  - 2.5. Loss of Secretariat services
  - 2.6. Loss of website
  - 2.7. Loss of reputation of Association
  - 2.8. Loss of electronic information (members' database)
  - 2.9. Loss of electronic information (conference registration database)
  - 2.10. Loss of electronic information (registration database for other events)
- 3. Assess risks
- 4. Evaluate what action to take
- 5. Review, monitor and assess periodically

# Risk area/risk identified

1.11 1.11 1.6	2.1 Reduced income from pharmaceutical industry	
Likelihood of	Probable (4)	
occurrence (score)	. ,	
Severity of impact (score)	Major (4)	
Overall or 'gross' risk	High (20)	
Control procedure	<ul> <li>Regular contact with pharma companies</li> <li>Sponsorship Rate Card set by trustees</li> <li>Quarterly reviews by trustees</li> </ul>	
Retained or 'net' risk	Medium	
Monitoring process	<ul> <li>Feedback from Annual Sponsors Meeting</li> <li>Feedback from sponsors and exhibitors at conference</li> <li>Sponsorship updates reviewed quarterly by trustees</li> <li>Annual review of overall budget by Officers (6-monthly)</li> <li>Regular review of overall budget by trustees (quarterly)</li> </ul>	
	Chair and Trustees	
Responsibility		
Responsibility Further action required	Agenda item for each trustee meeting (quarterly)	
<u> </u>	Agenda item for each trustee meeting (quarterly) Quarterly	
Further action required		
Further action required	Quarterly  2.2 Cancellation of annual or autumn conference	
Further action required Date of review  Likelihood of occurrence (score)	Quarterly  2.2 Cancellation of annual or autumn conference	
Pecnoncihility	CHAIL ALIA HUSICES	



Risk area/risk identified			
Control procedure	<ul> <li>Regular contact with conference venue and suppliers</li> </ul>		
Retained or 'net' risk	Medium		
Monitoring process	<ul><li>Regular review by Events Subcommittee</li><li>Venue visits by Local Host and Secretariat</li></ul>		
Responsibility	Events Subcommittee, Chair and Trustees		
Further action required	Agenda item for each Events Subcommittee and trustee meetings (quarterly)		
Date of review	Quarterly		
	2.3 Cancellation of one-day course, such as General Medicine course		
Likelihood of occurrence (score)	Possible (3)		
Severity of impact (score)	Major (4)		
Overall or 'gross' risk	Major (16)		
Control procedure	<ul> <li>Regular contact with study day venue and suppliers</li> </ul>		
Retained or 'net' risk	Medium		
Monitoring process	<ul><li>Regular review by Events Subcommittee</li><li>Venue visits by Secretariat</li></ul>		
Responsibility	Events Subcommittee, Chair and Trustees		
Further action required	Agenda item for Events Subcommittee and trustee meetings (quarterly)		
Date of review	Quarterly		
	2.4 Reduced income from membership fees		
Likelihood of occurrence (score)	Probable (4)		
Severity of impact (score)	Moderate (3)		
Overall or 'gross' risk	Moderate (12)		
Control procedure	<ul> <li>Useful membership benefits</li> </ul>		
	<ul><li>Set reasonable membership fees</li><li>Quarterly review by trustees</li></ul>		
Retained or 'net' risk	Moderate		
Monitoring process	<ul> <li>Regular email contact with BHIVA members</li> <li>Regular review of membership benefits</li> <li>Feedback from members via questionnaires (biennially)</li> <li>Statistical reports to trustees (quarterly)</li> </ul>		
Responsibility	Honorary Secretary and Trustees		
Further action required	Agenda item for each trustee meeting (quarterly)		
Date of review	Quarterly		
	2.5 Loss of Secretariat services		



Risk area/risk identified				
Likelihood of occurrence (score)	Possible (3)			
Severity of impact (score)	Moderate (3)			
Overall or 'gross' risk	Moderate (12)			
Control procedure	Regular meetings with secretariat			
·	3 to 6 monthly review			
Retained or 'net' risk	Moderate			
Monitoring process	Regular contact with secretariat			
Responsibility	Trustees and officers			
Further action required	Agenda for each trustee meeting			
Date of review	Quarterly			
	2.6 Loss of website			
Likelihood of occurrence (score)	Unlikely (2)			
Severity of impact (score)	Moderate (3)			
Overall or 'gross' risk	Moderate (9)			
Control procedure	Amazon Web services backup plan			
Retained or 'net' risk	Low			
Monitoring process	Notification by Amazon Web services			
Responsibility	Netsynergy			
Further action required	Agenda item for each Events Subcommittee and trustee meetings (quarterly)			
Date of review	Quarterly			
	2.7 Loss of reputation of the Association			
Likelihood of occurrence (score)	Possible (3)			
Severity of impact (score)	Moderate (3)			
Overall or 'gross' risk	Moderate (12)			
Control procedure	Trustees declaration of interest; vet who speak for BHIVA, internal controls, SOPs			
Retained or 'net' risk	Moderate			
Monitoring process	Trustee meetings review			
Responsibility	Trustees			
Further action required	Agenda of trustee meeting			
Date of review	quarterly			
	2.8 Loss of electronic information (members' database)			
Likelihood of occurrence (score)	Unlikely (2)			
•	Extremely Catastrophic (5)			



Risk area/risk identified					
Overall or 'gross' risk	Major (15)				
Control procedure	Weekly back ups				
Retained or 'net' risk	Low				
Monitoring process	Regular performance reports from Acumen Itd				
Responsibility	Medivents (subcontracted to Acumen Ltd but Medivents retain responsibility)				
Further action required	Agenda item for each Events Subcommittee and trustee meetings (quarterly)				
Date of review	Quarterly				
	2.9 Loss of electronic information (conference registration database)				
Likelihood of occurrence (score)	Unlikely (2)				
Severity of impact (score)	Major (4)				
Overall or 'gross' risk	Moderate (12)				
Control procedure	Weekly back ups				
Retained or 'net' risk	Low				
Monitoring process	Regular performance reports from Acumen Itd				
Responsibility	Medivents (subcontracted to Acumen Ltd but Medivents retain responsibility)				
Further action required	Agenda item for each Events Subcommittee and trustee meetings (quarterly)				
Date of review	Quarterly				
	2.10 Loss of electronic information (registration database for other events)				
Likelihood of occurrence (score)	Unlikely (2)				
Severity of impact (score)	Major (4)				
Overall or 'gross' risk	Moderate (12)				
Control procedure	Weekly back ups				
Retained or 'net' risk	Low				
Monitoring process	Regular performance reports from Acumen Itd				
Responsibility	Medivents (subcontracted to Acumen Ltd but Medivents retain responsibility)				
Further action required	Agenda item for each Events Subcommittee and trustee meetings (quarterly)				
Date of review	Quarterly				



# Annex 1: Risk register template with examples of use<sup>3</sup>

#### Scale

Likelihood							
			1 Remote	2 Unlikely	3 Possible	4 Probable	5 Highly Probable
	Insignificant	1	2	3	4	5	6
Impact	Minor	2	4	6	8	10	12
t	Moderate	3	6	9	12	15	18
	Major	4	8	12	16	20	24
	Extreme/ Catastrophic	5	10	15	20	25	30

Risk area/risk identified	Lack of return/diversity of investment portfolio		
Likelihood of occurrence (score)	Probable (4)		
Severity of impact (score)	Major (4)		
Overall or 'gross' risk	High (20)		
Control procedure	<ul> <li>Investment policy set by trustees</li> <li>Written instructions to FSA authorised investment adviser</li> <li>Quarterly reviews by trustees</li> </ul>		
Retained or 'net' risk	Medium		
Monitoring process	Performance reports reviewed quarterly by trustees		
Responsibility	Trustees and treasurer		
Further action required	Quarterly agenda item for trustee meetings		
Date of review	Quarterly		

 $<sup>^{\</sup>rm 3}$  Charity Commission of England and Wales, 'Charities and Risk Management', CC26



Example 2 Risk area/risk identified	Unsatisfactory fundraising		
Likelihood of occurrence (score)	Probable (4)		
Severity of impact (score)	Major (4)		
Overall or 'gross' risk	High (20)		
Control procedure	<ul> <li>Financial appraisal of new projects</li> <li>Benchmarking of returns achieved</li> <li>Budget reporting by fundraising activity</li> </ul>		
Retained or 'net' risk	Medium		
Monitoring process	<ul> <li>Financial reporting by fundraising activity</li> <li>Quarterly reporting by fundraising manager to trustees/CEO</li> </ul>		
Responsibility	Fundraising manager/CEO		
Further action required	<ul> <li>New initiatives to be approved by trustees unless included in current business plan</li> <li>Review of regulatory compliance of current methods</li> </ul>		
Date of review	<ul><li>When appropriate</li><li>Next trustee meeting</li></ul>		



## Annex 2: Examples of potential risk areas, their impact and mitigation<sup>3</sup>

The charitable sector is by its nature diverse. The nature of activities, funding base, reserves and structures will expose charities to differing areas of risk and levels of exposure. While the areas of risk identified below will deserve consideration by most charities, it is not an exhaustive list of all potential areas of risk and should not be a substitute for a charity undertaking its own processes for risk identification.

This list is intended to be an indication of some of the main areas of risk that may need to be considered by trustees. Illustrative examples of potential impact are given, as well as some illustrative examples of controls or action that might be taken to mitigate the risk or impact. Some risks will fall into more than one category. Although the list may be long, it is not exhaustive and there will be other risks that apply to a particular charity because of its own circumstances and activities.

The risks are classified as follows:

Potential risk	Potential impact	Steps to mitigate risk	
Governance risks			
The charity lacks direction, strategy and forward planning	<ul> <li>the charity drifts with no clear objectives, priorities or plans</li> <li>issues are addressed piecemeal with no strategic reference</li> <li>needs of beneficiaries not fully addressed</li> <li>financial management difficulties</li> <li>loss of reputation</li> </ul>	<ul> <li>create a strategic plan which sets out the key aims, objectives and policies</li> <li>create financial plans and budgets</li> <li>use job plans and targets</li> <li>monitor financial and operational performance</li> <li>get feedback from beneficiaries and funders</li> </ul>	
Trustee body lacks relevant skills or commitment	<ul> <li>charity         becomes         moribund or         fails to achieve         its purpose</li> <li>decisions are         made         bypassing the         trustees</li> </ul>	<ul> <li>review and agree skills         required</li> <li>draw up competence         framework and job         descriptions</li> <li>implement trustee training         and induction</li> <li>review and agree         recruitment processes</li> </ul>	



Potential risk	Potential impact	Steps to mitigate risk
	<ul> <li>resentment or apathy amongst staff</li> <li>poor decision making reflected in poor value for money on service delivery</li> </ul>	
Trustee body dominated by one or two individuals, or by connected individuals	<ul> <li>trustee body cannot operate effectively as strategic body</li> <li>decisions made outside of trustee body</li> <li>conflicts of interest</li> <li>pursuit of personal agenda</li> <li>culture of secrecy or deference</li> <li>arbitrary overriding of control mechanisms</li> </ul>	<ul> <li>consider the structure of the trustee body and its independence</li> <li>agree mechanisms to manage potential conflicts of interest</li> <li>review and agree recruitment and appointment processes in line with governing document</li> <li>agree procedural framework for meetings and recording decisions</li> </ul>
Trustees are benefiting from charity (e.g. remuneration)	<ul> <li>poor reputation, morale and ethos</li> <li>adverse impact on overall control environment</li> <li>conflicts of interest</li> <li>possibility of regulatory action</li> </ul>	<ul> <li>ensure legal authority for payment or benefit</li> <li>consider alternative staffing arrangements</li> <li>implement terms and procedures to authorise/approve expenses and payments</li> <li>agree procedures and methods to establish fair remuneration conducted separately from 'interested' trustee (remuneration committee/benchmarking exercise, etc.)</li> </ul>
Conflicts of interest	<ul> <li>charity unable to pursue its own interests and agenda</li> </ul>	<ul><li>agree protocol for disclosure of potential conflicts of interest</li></ul>



Potential risk	Potential impact	Steps to mitigate risk
	<ul> <li>decisions may not be based on relevant considerations</li> <li>impact on reputation</li> <li>private benefit</li> </ul>	<ul> <li>put in place procedures for standing down on certain decisions</li> <li>review recruitment and selection processes</li> </ul>
Ineffective organisational structure	<ul> <li>lack of information flow and poor decision-making procedures</li> <li>remoteness from operational activities</li> <li>uncertainty as to roles and duties</li> <li>decisions made at inappropriate level or excessive bureaucracy</li> </ul>	<ul> <li>use organisation chart to create a clear understanding of roles and duties</li> <li>delegation and monitoring should be consistent with good practice and constitutional or legal requirements</li> <li>review structure and the need for constitutional change</li> </ul>
Activities potentially outside objects, powers or terms of gift (restricted funds)	<ul> <li>loss of funds available for beneficiary class</li> <li>liabilities to repay funders</li> <li>loss of funder confidence</li> <li>potential breach of trust and regulatory action</li> <li>loss of beneficiary confidence</li> <li>taxation implications (if non-qualifying expenditure)</li> </ul>	<ul> <li>agree protocol for reviewing new projects to ensure consistency with objects, powers and terms of funding</li> <li>create financial systems to identify restricted funds and their application</li> </ul>
Loss of key staff	<ul><li>experience or skills lost</li><li>operational impact on key</li></ul>	<ul><li>succession planning</li><li>document systems, plans and projects</li></ul>



Potential risk	Potential impact	Steps to mitigate risk
	projects and priorities loss of contact base and corporate knowledge	<ul> <li>implement training programmes</li> <li>agree notice periods and handovers</li> <li>review and agree recruitment processes</li> </ul>
Reporting to trustees (accuracy, timeliness and relevance)	<ul> <li>inadequate information resulting in poor quality decision making</li> <li>failure of trustees to fulfil their control functions</li> <li>trustee body becomes remote and ill informed</li> </ul>	<ul> <li>put in place proper strategic planning, objective setting and budgeting processes</li> <li>timely and accurate project reporting</li> <li>timely and accurate financial reporting</li> <li>assess and review projects and authorisation procedures</li> <li>have regular contact between trustees and senior staff and managers</li> </ul>
Operational risks		
Contract risk	<ul> <li>onerous terms and conditions</li> <li>liabilities for non- performance</li> <li>non- compliance with charity's objects</li> <li>unplanned subsidy of public provision</li> </ul>	<ul> <li>create cost/project appraisal procedures</li> <li>agree authorisation procedures</li> <li>get professional advice on terms and conditions</li> <li>put in place performance monitoring arrangements</li> <li>consider insurable risks cover</li> </ul>
Service provision - customer satisfaction	<ul> <li>beneficiary complaints</li> <li>loss of fee income</li> <li>loss of significant contracts or claims under contract</li> <li>negligence claims</li> <li>reputational risks</li> </ul>	<ul> <li>agree quality control procedures</li> <li>implement complaints procedures</li> <li>benchmark services and implement complaints review procedures</li> </ul>



Potential risk	Potential impact	Steps to mitigate risk
Project or service development	<ul> <li>compatibility         with objects,         plans and         priorities</li> <li>funding and         financial         viability</li> <li>project viability</li> <li>skills         availability</li> </ul>	<ul> <li>appraise project, budgeting and costing procedures</li> <li>review authorisation procedures</li> <li>review monitoring and reporting procedures</li> </ul>
Competition from similar organisations	<ul> <li>loss of contract income</li> <li>reduced fund-raising potential</li> <li>reduced public profile</li> <li>profitability of trading activities</li> </ul>	<ul> <li>monitor and assess performance and quality of service</li> <li>review market and methods of service delivery</li> <li>agree fund-raising strategy</li> <li>ensure regular contact with funders</li> <li>monitor public awareness and profile of charity</li> </ul>
Suppliers, dependency, bargaining power	<ul> <li>dependency on key supplier</li> <li>lack of supplier to meet key operational objectives</li> <li>non- competitive pricing/quotes</li> <li>insufficient buying power</li> </ul>	<ul> <li>use competitive tendering for larger contracts</li> <li>put in place procedures for obtaining quotations</li> <li>authorised suppliers listing</li> <li>monitor quality/timeliness of provision</li> <li>use service level agreements</li> <li>consider use of buying consortia</li> </ul>
Capacity and use of resources including tangible fixed assets	<ul> <li>under-utilised or lack of building/office space</li> <li>plant and equipment obsolescence impacting on operational performance</li> <li>mismatch between staff allocations and key objectives</li> <li>spare capacity not being utilised or</li> </ul>	<ul> <li>agree building and plant inspection programme</li> <li>agree repair and maintenance programme</li> <li>agree capital expenditure budgets</li> <li>undertake efficiency review</li> </ul>



Potential risk	Potential impact	Steps to mitigate risk
	turned to account	
Security of assets	<ul> <li>loss or damage</li> <li>theft of assets</li> <li>infringements         of intellectual         property rights</li> </ul>	<ul> <li>review security         arrangements</li> <li>create asset register and         inspection programme</li> <li>agree facility management         arrangements</li> <li>have safe custody         arrangements for title         documents and land         registration</li> <li>manage use of patent and         intellectual property</li> <li>review insurance cover</li> </ul>
Fundraising	<ul> <li>unsatisfactory returns</li> <li>reputational risks of campaign or methods used</li> <li>actions of agents and commercial fund-raisers</li> <li>compliance with law and regulation</li> </ul>	<ul> <li>implement appraisal, budgeting and authorisation procedures</li> <li>review regulatory compliance</li> <li>monitor the adequacy of financial returns achieved (benchmarking comparisons)</li> <li>stewardship reporting in annual report</li> </ul>
Employment issues	<ul> <li>employment disputes</li> <li>health and safety issues</li> <li>claims for injury, stress, harassment, unfair dismissal</li> <li>equal opportunity and diversity issues</li> <li>adequacy of staff training</li> <li>child protection issues</li> <li>low morale</li> <li>abuse of vulnerable beneficiaries</li> </ul>	<ul> <li>review recruitment processes</li> <li>agree reference and qualification checking procedures, job descriptions, contracts of employment, appraisals and feedback procedures</li> <li>implement job training and development</li> <li>implement health and safety training and monitoring</li> <li>be aware of employment law requirements</li> <li>implement staff vetting and legal requirements (e.g., DBS checks)</li> <li>agree a whistle-blowing policy</li> </ul>



Potential risk	Potential impact	Steps to mitigate risk
High staff turnover	<ul> <li>loss of         experience or         key technical         skills</li> <li>recruitment         costs and lead         time</li> <li>training costs</li> <li>operational         impact on staff         morale and         service         delivery</li> </ul>	<ul> <li>review interview and assessment processes</li> <li>agree fair and open competition appointment for key posts</li> <li>agree job descriptions and performance appraisal and feedback systems</li> <li>conduct 'exit' interviews</li> <li>review rates of pay, training, working conditions, job satisfaction</li> </ul>
Volunteers	<ul> <li>lack of competences, training and support</li> <li>poor service for beneficiaries</li> <li>inadequate vetting and reference procedures</li> <li>recruitment and dependency</li> </ul>	<ul> <li>review and agree role, competencies</li> <li>review and agree vetting procedures</li> <li>review and agree training and supervision procedures</li> <li>agree development and motivation initiatives</li> </ul>
Health, safety and environment	<ul> <li>staff injury</li> <li>product or service liability</li> <li>ability to operate (see Compliance risks)</li> <li>injury to beneficiaries and the public</li> </ul>	<ul> <li>comply with law and regulation</li> <li>train staff and compliance officer</li> <li>put in place monitoring and reporting procedures</li> </ul>
Disaster recovery and planning	<ul> <li>computer         system failures         or loss of data</li> <li>destruction of         property,         equipment,         records         through fire,         flood or similar         damage</li> </ul>	<ul> <li>agree IT recovery plan</li> <li>implement data backup procedures and security measures</li> <li>review insurance cover</li> <li>create disaster recovery plan including alternative accommodation</li> </ul>
Procedural and systems documentation	■ lack of awareness of	<ul><li>properly document policies and procedures</li></ul>



Potential risk	Potential impact	Steps to mitigate risk
	procedures and policies     actions taken without proper authority	■ audit and review of systems
Information technology	<ul> <li>systems fail to meet operational need</li> <li>failure to innovate or update systems</li> <li>loss/corruption of data e.g. donor base</li> <li>lack of technical support</li> <li>breach of data protection law</li> </ul>	<ul> <li>appraise system needs and options</li> <li>appraise security and authorisation procedures</li> <li>implement measures to secure and protect data</li> <li>agree implementation and development procedures</li> <li>use service and support contracts</li> <li>create disaster recovery procedures</li> <li>consider outsourcing</li> <li>review insurance cover for any insurable loss</li> </ul>
Financial risks		
Budgetary control and financial reporting	<ul> <li>budget does not match key objectives and priorities</li> <li>decisions made on inaccurate financial projections or reporting</li> <li>decisions made based on unreliable costing data or income projections</li> <li>inability to meet commitments or key objectives</li> <li>poor credit control</li> <li>poor cash flow and treasury management</li> </ul>	<ul> <li>link budgets to business planning and objectives</li> <li>monitor and report in a timely and accurate way</li> <li>use proper costing procedures for product or service delivery</li> <li>ensure adequate skills base to produce and interpret budgetary and financial reports</li> <li>agree procedures to review and action budget/cash flow variances and monitor and control costs</li> <li>regularly review reserves and investments</li> </ul>



Potential risk	Potential impact	Steps to mitigate risk
	<ul><li>ability to function as going concern</li></ul>	
Reserves policies	<ul> <li>lack of funds or liquidity to respond to new needs or requirements</li> <li>inability to meet commitments or planned objectives</li> <li>reputational risks if policy cannot be justified</li> </ul>	<ul> <li>link reserves policy to business plans, activities and identified financial and operating risk</li> <li>regularly review reserves policy and reserve levels</li> </ul>
Cash flow sensitivities	<ul> <li>inability to meet commitments</li> <li>lack of liquidity to cover variance in costs</li> <li>impact on operational activities</li> </ul>	<ul> <li>ensure adequate cash flow projections (prudence of assumptions)</li> <li>identify major sensitivities</li> <li>ensure adequate information flow from operational managers</li> <li>monitor arrangements and reporting</li> </ul>
Dependency on income sources	<ul> <li>cash flow and budget impact of loss of income source</li> </ul>	<ul> <li>identify major dependencies</li> <li>implement adequate</li> <li>reserves policy</li> <li>consider diversification plans</li> </ul>
Pricing policy	<ul> <li>reliance on subsidy funding</li> <li>unplanned loss from pricing errors</li> <li>cash flow impact on other activities</li> <li>loss of contracts if uncompetitive</li> <li>affordability of services to beneficiary class</li> </ul>	<ul> <li>ensure accurate costing of services and contracts</li> <li>compare with other service providers</li> <li>notify and agree price variations with funders</li> <li>monitor funder satisfaction</li> <li>develop pricing policy for activities including terms of settlement and discounts</li> </ul>
Borrowing	■ interest rate movements	<ul><li>appraise future income streams to service the debt</li></ul>



Potential risk	Potential impact	Steps to mitigate risk
	<ul> <li>ability to meet repayment schedule</li> <li>security given over assets</li> <li>regulatory requirements</li> </ul>	<ul> <li>appraise terms (rates available fixed, capped, variable, etc.)</li> <li>appraise return on borrowing</li> <li>use appropriate professional advice</li> </ul>
Guarantees to third parties	<ul> <li>call made under guarantee</li> <li>lack of reserves or liquidity to meet call</li> <li>consistency with objects and priorities</li> </ul>	<ul> <li>review approval and authority procedures</li> <li>agree procedures to ensure consistency with objects, plans and priorities</li> <li>ensure financial reporting of contingency and amendment to reserves policy</li> </ul>
Foreign currency	<ul> <li>currency         exchange         losses</li> <li>uncertainty         over project         costs</li> <li>cash flow         impact on         operational         activities</li> </ul>	<ul> <li>ensure proper cash flow management and reserves policy</li> <li>use currency matching (cost to charity in home currency)</li> <li>consider forward contracts for operational needs (hedging)</li> </ul>
Pension commitments	<ul> <li>under-funded defined benefit scheme</li> <li>impact on future cash flows</li> <li>failure to meet due dates of payment</li> <li>regulatory action or fines</li> </ul>	<ul> <li>use actuarial valuations</li> <li>review pension scheme arrangements (e.g. money purchase schemes)</li> <li>review procedures for admission to scheme and controls over pension administration</li> </ul>
Inappropriate or loss- making non-charitable trading activities	<ul> <li>resources         withdrawn         from key         objectives</li> <li>resources and         energy         diverted from         profitable fund-         raising or core         activities</li> </ul>	<ul> <li>monitor and review business performance and return</li> <li>ensure adequacy of budgeting and financial reporting within the subsidiary or activity budget</li> <li>review and agree adequate authorisation procedures for any funding provided by charity (prudence, proper advice, investment criteria)</li> </ul>



Potential risk	Potential impact	Steps to mitigate risk
	<ul> <li>regulatory         action, and         accountability</li> <li>reputational         risk if         publicised</li> </ul>	<ul> <li>report funding and performance as part of charity's own financial reporting system</li> <li>appraise viability</li> <li>consider transfer of undertakings to separate subsidiary</li> </ul>
Investment policies	<ul> <li>financial loss through inappropriate or speculative investment</li> <li>unforeseen severe adverse investment conditions</li> <li>financial loss through lack of investment advice, lack of diversity</li> <li>cash flow difficulties arising from lack of liquidity</li> </ul>	<ul> <li>review and agree investment policy</li> <li>obtain proper investment advice or management</li> <li>consider diversity, prudence and liquidity criteria</li> <li>implement adequate reserves policy</li> <li>use regular performance monitoring</li> </ul>
Protection of permanent endowment	<ul> <li>loss of future income stream or capital values</li> <li>buildings unfit for purpose</li> <li>income streams inappropriate to meet beneficiary needs</li> </ul>	<ul> <li>review and agree investment policy</li> <li>obtain proper investment advice or management</li> <li>consider diversity, prudence and liquidity criteria</li> <li>use regular performance monitoring</li> <li>ensure maintenance and surveyor inspection of buildings</li> <li>review insurance needs</li> </ul>
Compliance with donor- imposed restrictions	<ul> <li>funds applied outside restriction</li> <li>repayment of grant</li> <li>future relationship with donor and beneficiaries</li> <li>regulatory action</li> </ul>	<ul> <li>implement systems to identify restricted receipts</li> <li>agree budget control, monitoring and reporting arrangements</li> </ul>



Potential risk	Potential impact	Steps to mitigate risk
Fraud or error	<ul> <li>financial loss</li> <li>reputational risk</li> <li>loss of staff morale</li> <li>regulatory action</li> <li>impact on funding</li> </ul>	<ul> <li>review financial control procedures</li> <li>segregate duties</li> <li>set authorisation limits</li> <li>agree whistle-blowing antifraud policy</li> <li>review security of assets</li> <li>identify insurable risks</li> </ul>
Counter party risk	<ul> <li>financial loss</li> <li>disruption to activities or operations</li> </ul>	<ul> <li>research counter party's financial sustainability</li> <li>contractual agreement</li> <li>consider staged payments</li> <li>agree performance measures</li> <li>monitor and review investments</li> <li>establish monitoring and review arrangements where counter party is the charity's agent ('conduit funding' arrangements</li> </ul>
Environmental or externa	l factors	
Public perception	<ul> <li>impact on voluntary income</li> <li>impact on use of services by beneficiaries</li> <li>ability to access grants or contract funding</li> </ul>	<ul> <li>communicate with supporters and beneficiaries</li> <li>ensure good quality reporting of the charity's activities and financial situation</li> <li>implement public relations training/procedures</li> </ul>
Adverse publicity	<ul> <li>loss of donor confidence or funding</li> <li>loss of influence</li> <li>impact on morale of staff</li> <li>loss of beneficiary confidence</li> </ul>	<ul> <li>implement complaints         procedures (both internal         and external)</li> <li>agree proper review         procedures for complaints</li> <li>agree a crisis management         strategy for handling -         including consistency of key         messages and a nominated         spokesperson</li> </ul>
Relationship with funders	<ul> <li>deterioration in relationship may impact on funding and support available</li> </ul>	<ul> <li>ensure regular contact and briefings to major funders</li> <li>report fully on projects</li> <li>meet funders' terms and conditions</li> </ul>



Potential risk	Potential impact	Steps to mitigate risk
Demographic consideration	<ul> <li>impact of demographic distribution of donors or beneficiaries</li> <li>increasing or decreasing beneficiary class</li> <li>increasing or decreasing donor class</li> </ul>	<ul> <li>profile donor base</li> <li>profile and understand beneficiary needs</li> <li>use actuarial analysis to establish future funding requirements</li> </ul>
Government policy	<ul> <li>availability of contract and grant funding</li> <li>impact of tax regime on voluntary giving</li> <li>impact of general legislation or regulation on activities undertaken</li> <li>role of voluntary sector</li> </ul>	<ul> <li>monitor proposed legal and regulatory changes</li> <li>consider membership of appropriate umbrella bodies</li> </ul>
Compliance risk (law and	regulation)	
Compliance with legislation and regulations appropriate to the activities, size and structure of the charity	<ul> <li>fines, penalties or censure from licensing or activity regulators</li> <li>loss of licence to undertake particular activity (see operational risks)</li> <li>employee or consumer action for negligence</li> <li>reputational risks</li> </ul>	<ul> <li>identify key legal and regulatory requirements</li> <li>allocate responsibility for key compliance procedures</li> <li>put in place compliance monitoring and reporting</li> <li>prepare for compliance visits</li> <li>obtain compliance reports from regulators (where appropriate) - auditors and staff to consider and action at appropriate level</li> </ul>
Regulatory reporting requirements: Financial and other reporting	regulatory action	<ul><li>review and agree compliance procedures and</li></ul>



Potential risk	Potential impact	Steps to mitigate risk
requirements will be dependent on how the charity is constituted and may also vary according to funding arrangements	<ul><li>reputational risks</li><li>impact on funding</li></ul>	allocation of staff responsibilities
Taxation	<ul> <li>penalties, interest and 'back duty' assessments</li> <li>loss of income e.g. failure to utilise gift aid arrangements</li> <li>loss of mandatory or discretionary rate relief</li> <li>failure to utilise tax exemptions and reliefs</li> </ul>	<ul> <li>review PAYE compliance procedures</li> <li>review VAT procedures</li> <li>file timely tax returns</li> <li>understand exemptions and reliefs available (direct tax and VAT)</li> <li>take advice on employment status and contract terms and tax</li> <li>implement budget and financial reporting identifying trading receipts, and tax recoveries</li> </ul>
Professional advice	<ul> <li>lack of investment strategy or management</li> <li>failure to optimise fiscal position</li> <li>contract risks</li> <li>failure to address compliance risks</li> </ul>	<ul> <li>identify and ensure access to professional advice</li> <li>identify issues where advice is required</li> <li>conduct compliance reviews</li> </ul>