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Charities Toolkit

A toolkit for effective risk management

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Five benchmarks for an effective risk management framework

1. A clear appetite for risk expressed through a risk policy
2. An understanding of risks and their categorisation
3. An effective process for assessing and prioritising risks
4. A sound response to emerging issues and new risks
5. Quality assurance to keep risks under control

Effective risk management is of utmost importance to every organisation and is fundamental to sustaining business development as it serves to:

- Protect existing value in the charity – by reducing the chance of loss or error that might otherwise occur through poor decision making
- Support effective evaluation of significant decisions – by clarifying risks, which in turn minimises the chance of unexpected or unwanted consequences of decisions
- Facilitate good governance – by providing trustees with the means to control risk within the charity's strategic planning process

In the 2012 Charities Risk Survey, undertaken jointly by CFDG and PKF, 30% of charities who responded to the survey did not have a risk policy and 41% did not have an action plan to address risks higher than their risk tolerance. The survey captured a wide range of charities in terms of size and sectors, so it would seem that there is still some way to go in ensuring that the charity sector maximises the value to be gained from effective risk management.

This toolkit aims to provide practical support for charities in improving the way they manage risk. It sets out five key benchmarks that will form the basis of an effective risk management framework and provides a checklist of questions to match against your own charity's operations.

Throughout this guidance we introduce example templates to support the development of your own risk management practices. These templates can be found at the end of this toolkit and online at www.kingstonsmith.co.uk/charities.

The cycle of risk management

Risk management should be embedded in the strategic planning of all charities. Without it, trustees cannot make effective decisions to meet their charitable objectives and to safeguard charity assets.

Too often it is the unexpected risks that cause the most harm to organisations. For example – the removal of a significant funding contract at short notice; the damage to reputation caused by an inappropriate action or comment; a change in legislation outside of the charity's control. Risk management needs to be dynamic in order to capture and anticipate new risks and to assess the trade off between risk and opportunity. It should be an ongoing cycle, that used properly, will enhance decision making in any organisation.

Use the five benchmarks as a means to identify aspects of your risk management systems that already work well and to consider areas for improvement. This will help to ensure that effective decisions are made based on a sound understanding of the risks and opportunities you face.

1. A clear appetite for risk expressed through a risk policy

The charity, through its board of trustees, must have a clear understanding of the level of risk that is acceptable to it in achieving its objectives and mission.

It should also appreciate that there is a disctinction between risk 'appetite', which is the level of risk the board is willing to accept in pursuit of the charity's objectives and risk 'tolerance' which is the amount of risk beyond which the board will not accept exposure in any circumstance.

Has the board clearly considered its appetite for risk?

Risk appetite should be set in the context of the charity's ability to absorb and to manage each risk and this in turn, is dependent upon factors including:

- The nature and complexity of activity undertaken
- General financial health and the level of reserves available to absorb financial risks
- The adequacy of internal control systems
- The charity's vulnerability to external factors outside its control
- The skills set of employees and trustees
- The adequacy of disaster recovery plans

Does the board understand that risk appetite is flexible?

Some strategic decisions will be made, even though they are perceived as higher risk, because the opportunities they bring are important for the charity. For example, a change of direction that improves service delivery but that involves working with a new partner; or a project undertaken in an area of conflict overseas.

Some risks will not be considered worth taking at any cost (such as those related to investment in volatile or 'non-ethical' shares).

Not all decisions will warrant the same appetite for risk so there is no 'one size fits all' solution. The appetite for risk will be dependent, to an extent, on whether it is considered in the context of strategic or operational decision making.

It is important to balance an entity's ability to take risks with its ability to control them. For strategic decision making, it is likely that more emphasis will be placed on looking at the propensity to accept risk, whereas at an operational level the propensity to exercise control over risk may require greater focus.

Has the risk appetite been translated into a risk policy that management and staff can understand and use?

The appetite for risk needs to be embedded throughout the charity so that staff and management understand what needs to be considered in their own decision making and areas of responsibility.

The risk policy should set out clearly the charity's approach to risk management and what this will achieve for the organisation. The policy needs to clearly identify who is responsible for monitoring and managing particular elements of the risk management cycle; how this is reported and to whom; and most importantly, how any emerging issues perceived to have an impact on the charity's risk profile are acted upon and escalated.

The risk policy should refer to control boundaries that are set to mitigate risk including:

- Limits within which individuals operate. For example, financial limits for cheque signing and authorisation of expenditure; limits on decision making powers and lines of authority for types of decisions such as who can approve a contract or make a change to a bank mandate
- Minimum control standards to which the organisation must adhere. For example, obtaining CRB checks for relevant staff; meeting relevant legal requirements such as Care Standards for the health sector; procedures for managing volunteers and staff working in conflict zones; health and safety standards; ISO standards (international organisational standards for business), PQASSO (Practical Quality Assurance System for Small Organisations) quality standards and similar

Template A sets out an example of a risk policy.

2. An understanding of risks and their categorisation

Risk needs to be managed within the context of adding value to the charity. It is not so much about risk aversion, as the ability to consider and manage risks attached to new opportunities or ventures.

Has the charity fully considered the range of potential risks it could face?

It is important to appreciate that there is a vast 'pool' of possible risks that could be of relevance to any charity and that those can be both internally and externally driven. Appreciating the potential 'pool' of risks then allows this 'pool' to be reduced to the relevant key risks in any decision.

The Charity Commission's Guidance CC26 Charities and Risk Management, provides a comprehensive list of potential risks in Annex 2, analysed under the following categories:

- Governance risks – affecting the capability of the board to make effective strategic decisions;
- Operational risks – affecting the day to day operational capability of the charity;
- Financial risks – (most risks will ultimately have a financial impact);
- Environmental and external risks – (which can often be less easy for the charity to control); and
- Regulatory compliance risks.

This list can be accessed at www.charitycommission.gov.uk/publications/cc26.aspx and is a useful starting point when brain storming risks that might be relevant to your charity.

Does the charity have a consistent and agreed approach to considering risk?

Every major decision a charity takes, whether it is launching a new service or project, restructuring a team, moving premises or replacing an IT system has risks attached to it. The charity should have an agreed approach (confirmed in its risk policy) that ensures relevant risks, not only financial, are considered at an appropriate level before key decisions are made.

The process for sign off at board level needs to ensure the board has adequate time to collectively consider and evaluate the risks relevant to strategic decisions.

On operational matters, the management team will normally have the authority to make decisions, but in any event a consistent approach and culture of risk consideration needs to be adopted throughout the organisation.

People tend to gravitate to others with a like mind so the risk culture of any organisation can have a significant impact on its ability to succeed. If the culture and approach to risk management is too formal, it could stifle appropriate risk taking and innovation. However, the lack of a cohesive value system or culture linked to risk management, could undermine a charity's ability to make effective decisions.

3. An effective process for assessing and prioritising risks

Have the trustees adequately delegated responsibility for assessing and prioritising risk?

Whilst the trustees have overall responsibility for developing the risk profile and the risk management framework, it is very unlikely that they will carry out the detailed risk assessment themselves. In larger charities a risk 'sub committee' of the trustee board is often delegated responsibility for managing the risk framework.

Particular aspects of risk assessment – for example, related to employment matters, health and safety and IT issues should be delegated to individuals with particular knowledge and skills in these areas. For smaller charities that may not have extensive in-house expertise in some of these areas, it may be that external advice needs to be sought to support the process.

Involvement in the framework setting and review process at all levels helps to encourage ownership of risk management throughout the charity and a positive attitude to risk mitigation.

Do the trustees maintain adequate oversight of key risks and their prioritisation?

There are several tools that can be used to assess and prioritise risk and to help with their systematic evaluation and ranking. These tools can be used to establish risks on a global basis and often underpin the creation of a **risk register** which can be found in **template D**.

A risk register is a useful way of collating key strategic risks, however it can only ever capture risks at the point at which it is written.

Charities will have many projects and decisions in hand at any time that fulfil the overall strategic aims of the charity. This will inevitably require delegation of day to day decisions involving risk at a project level to members of the operational management team. A culture of 'risk aware' decision-making is far more important than the creation of a generic and lengthy risk register that is little used in practice.

One of the easiest ways to identify risk visually is through **risk mapping** as illustrated in **template B.**

A more sophisticated methodology involves **risk scoring and ranking – template C** – and this is often used in conjunction with a risk register.

In this model, likelihood and impact are assessed separately for each risk and graded from 1 to 5. The model can be further enhanced by adding extra weighting to the 'impact' element of the model.

The argument is that the impact of any risk will always have more importance than the likelihood that it will arise and this is particularly true where an organisation is inherently vulnerable to risk (perhaps because of its geographical location of operation in a developing country or its poor finances).

On the occasion when that unlikely event with a high impact rating does happen (e.g. sudden death of the Chief Executive) it is most likely to have the biggest overall effect on the charity's ability to function, particularly where it is driven by factors outside the charity's control.

Have the trustees considered the cumulative impact of low level risks?

Low impact risks can often fall below the radar because they are deemed insignificant, but if they happen repeatedly they can create a much higher cumulative impact. For example, a photocopier that keeps breaking down when needed to produce paperwork, can prevent the charity from meeting deadlines for funding submissions, with a detrimental impact on the charity's reputation.

It is important then, to consider the interaction of risks and to anticipate the impact of risks that might develop cumulatively, although they may be considered individually as low risk.

Have trustees carried out sufficient due diligence to support their decisions?

Adequate due diligence is fundamental to effective risk management. Emphasising the need to 'look before you leap' should ensure that mitigation of key risks is carefully factored into the decision process.

Consider how risks can be:

- **Avoided** – by ceasing an activity or action;
- **Transferred** – by passing responsibility to a third party (e.g. through insurance, use of trading subsidiary, outsourcing); and
- **Limited** – by improving systems to reduce exposure (e.g. through strengthened internal controls, forward exchange contracts), before deciding to accept any remaining risk.

The impact of a particular risk can be affected as much by the charity's lack of adequate response to the risk as by its ability to respond appropriately.

4. A sound response to emerging issues and new risks

Risk registers will often fail to accurately predict what new risks will occur and when. Organisations have to be good at responding quickly and effectively to new risks as they arise and before they can escalate into major problems.

Are emerging issues identified and escalated appropriately?

Staff need to be trained in how to escalate bad news as there can often be a tendency to withhold such information, particularly where staff feel they are responsible for the issue that has arisen. 'Early warning' reports are a way of ensuring that complaints from stakeholders, staffing issues and system outages are highlighted quickly. Staff need to understand clearly the process required, how and what to report and to whom designated issues should be reported.

Are escalated issues followed up?

The biggest reason for operational failure is due to lack of accountability. Issues fall between cracks in the organisation and are often seen to be the responsibility of 'someone else'. Other times they are investigated without getting to the root of the problem. Follow up needs to be delegated to someone with adequate experience to manage this process properly.

Both trustees and management should be aware of and set warning triggers that might indicate escalating risks that should be acted on quickly in order to minimise potential damage.

Template E sets out examples of key indicators to trigger action on risk.

Is there adequate and proven crisis management capability?

A crisis is often the result of a physical scenario such as an office fire, but can also include issues such as the loss of a key donor or member of staff, or adverse media commentary which damages the charity's reputation. Any crisis needs to be managed well and with good communication in order to limit the damage suffered.

Ensure that your charity has a designated team that is responsible for tasks in a crisis. Each member must be clear about their role and there must be adequate protocol for communication – including contact numbers, and a system for cascading information out to staff and for communication with the media.

Not every crisis is foreseeable, but some scenarios such as IT failures will be predictable, if not welcome, and plans should be made to deal with them. Other issues may be specific to your charity, for example operating in a war zone; where there is a possibility of natural disasters; or being reliant on a single donor for funding.

Preparation and planning for given scenarios relevant to your charity will help to reduce response times and related risks in the event of a real crisis. Testing of planned responses will help to eliminate inadequacies and develop resilience for a real crisis.

5. Quality assurance to keep risks under control

Trustees are remote from the day to day operations of the organisation and are reliant to a great extent on management to provide them with information on the state of risk within their charity. The board needs assurance that risk is being managed and controlled effectively on their behalf.

Does the board have assurance over its key operating controls (and related risks)?
Trustees can draw on support from a number of sources for assurance on the internal control systems in operation. External auditors can provide a source of assurance, but by the nature of an external audit, this will focus primarily on key financial controls and their impact on reporting in the statutory accounts.

Larger charities can use the internal audit function to provide a more in depth review of particular aspects of internal control.

Smaller charities should consider benchmarking their internal processes against best practice. A good starting point is the Charity Commission's checklist *CC8 Internal Financial Controls for Charities*. Further advice is also provided in *CC10 The Hallmarks of an Effective Charity*.

Does the board have assurance over its key operating plans/actions (and related risks)?
Risk management underpins all good decision making but this is only the first stage in the process. The trustee board needs to follow through for assurance that the action plan arising from a particular decision has been implemented effectively and that it has been carried through to a successful conclusion.

Good communication and reporting structures are crucial to this process. Any reporting on outcomes and events needs to include reference both to the risks that have been managed and also any new risks that are appearing on the horizon.

Things may not always go according to plan and unforeseen events or difficulties encountered along the way require reassessment thus reinforcing the need to keep risk management fluid and dynamic.

Does the board incentivise its staff to make the right decisions?
Staff should be incentivised to do the right thing by implementing a performance reward mechanism that encourages staff to make sound decisions, incorporating appropriate risk management practices and to act responsibly.

Conclusion

A sound risk management framework will provide significant value to the trustees, staff and beneficiaries of any charity:

- It ensures a culture is adopted throughout the organisation that supports sound decision making through a robust assessment of the risks and opportunities faced and a prioritisation of activity, based on a structured understanding of business consequences, volatility and added value.
- It protects the value that exists in the charity and helps to build upon this, by reducing the chance of failure and the uncertainty that organisational objectives will be met and by contributing to the efficient use of resources.
- It provides a framework of constraints and limits, which mitigate the potential for risk and within which management can operate with confidence.
- It supports accountability and promotes operational efficiency, which in turns creates positive reputation and relationships both within the charity and with its external stakeholders.

External reporting on risk management

Accounting and Reporting by Charities – Statement of Recommended Practice (SORP) requires all charities that are subject to statutory audit to include a statement in the trustees' report, as part of the charity's annual statutory report and accounts, confirming that the trustees have indentified and reviewed the major risks to which the charity is exposed and have put in place systems to manage them. The new SORP, which apply for accounting periods commencing on or after 1 January 2015, anticipates extending this requirement to include a description of the principle risks and uncertainties facing the charity and a summary of the charity's strategies and plans for mitigating those risks.

Charities incorporated under Company Law, other than those that fall within the Companies Act definition of a small company, must already include a business review in their trustee/directors' report that includes a description of the principal risks and uncertainties facing the charity.

Having a sound framework for risk management in place will allow trustees to meet these requirements with confidence.

Practical templates

Use our example templates, which follow, to support the governance process for the following:

A – Risk policy
B – Risk mapping
C – Risk scoring and ranking
D – Risk register
E – Key indicators to trigger action risk

These do need to be adapted to fit the size and structure of each entity but the following should be used a general guide for further consideration.

A Word version of these templates is available from our website www.kingstonsmith.co.uk/charities/risk-management/

Further information on governance can be found in our toolkit for good governance, available to download from our website.

Template A
Risk policy example

Note: Items within the template in italics indicate suggested text which should be adapted to suit the individual charity or removed where not considered relevant.

Risk policy purpose
This policy:

- Is a formal acknowledgement that the trustee board is committed to maintaining a strong risk management framework. The aim is to ensure that the charity makes every effort to manage risk appropriately by maximising potential opportunities whilst minimising the adverse affects of risks.
- Should be used to support the internal control systems of the charity, enabling the charity to respond to operational, strategic and financial risks regardless of whether they are internally or externally driven.

Risk policy objective
- To confirm and communicate the charity's commitment to risk management.
- To establish a consistent framework and protocol for determining appetite for and tolerance of risk and for managing risk.
- To assign accountability to management and staff for risks within their control and provide a structured process for risk to be considered, reported and acted upon throughout the organisation.

Risk policy statement
The trustees and executive management of the charity believe that sound risk management is integral to both good management and good governance practice.

Risk management should form an integral part of the charity's decision–making and be incorporated within strategic and operational planning.

Risk assessment will be conducted on all new activities and projects to ensure they are in line with the charity's objectives and mission.

Any risks or opportunities arising will be identified, analysed and reported at an appropriate level.

A risk register covering key strategic risks will be maintained and updated *at least twice* a year and more frequently where risks are known to be volatile.

A more detailed operational risk register will be maintained in aspects where this is considered appropriate, taking account of the impact of potential risk and the cost benefit of the exercise.

All staff will be provided with adequate training on risk management and their role and responsibilities in implementing this. *Detailed requirements in these areas are set out in the Recruitment, Training and Code of Conduct Sections of the Staff Handbook.*

The charity will regularly review and monitor the effectiveness of its risk management framework and update it as considered appropriate.

Reports will be made to the trustee board and CEO each quarter of continuing and emerging high concern risks and those where priority action is needed to effect better control.

Individual error and incident reports will be required from individual staff where a reportable event is identified. *The procedures for this are set out in a separate 'reportable events policy' which is specified within our crisis management plan. Such incidents which are considered to pose a significant threat to the charity, financial or otherwise, will be escalated in accordance with the crisis management plan.*

Organisational roles

The role of the trustee board

- To ensure that a culture of risk management is embedded throughout the charity
- To set the level of risk appetite and risk tolerance for the organisation as a whole and in specific circumstances
- To communicate the charity's approach to risk and set standards of conduct expected of staff
- To ensure risk management is included in the development of business plans, budgets and when considering strategic decisions
- To approve major decisions affecting the charity's risk profile or exposure
- To satisfy itself that less fundamental risks are being actively managed and controlled
- To regularly review the charity's approach to risk management and approve any changes to this
- To receive reports from internal audit, risk subcommittee, external consultants and any other relevant parties and to make recommendations on this

The role of the CEO and the senior management team

- To ensure that risk management policy is implemented throughout the organisation
- To anticipate and consider emerging risks and to keep under review the assessed level of likelihood and impact of existing key risks
- Provide regular and timely information to the trustees on the status of risks and their mitigation
- To implement adequate corrective action in responding to significant risks; to learn from previous mistakes and to ensure that crisis management plans are sufficiently robust to cope with high level risk

The role of project and team managers

Project and team managers are responsible for managing project specific operational risks and for ensuring that risks are reported upon in a timely fashion through designated lines of reporting.

Interaction with internal control systems

Risk management forms part of the charity's system of internal controls and should be read in conjunction with the policies and detailed controls procedures specified in our *Internal and Financial Controls and Procedures Document. This document sets out in detail operational limits within which individuals may act in particular circumstances in order to minimise the risk of fraud or error.* These limits cover amongst other things – control over bank payments and receipts, authorisation of and processing of expenditure and approval required at particular levels of decision making.

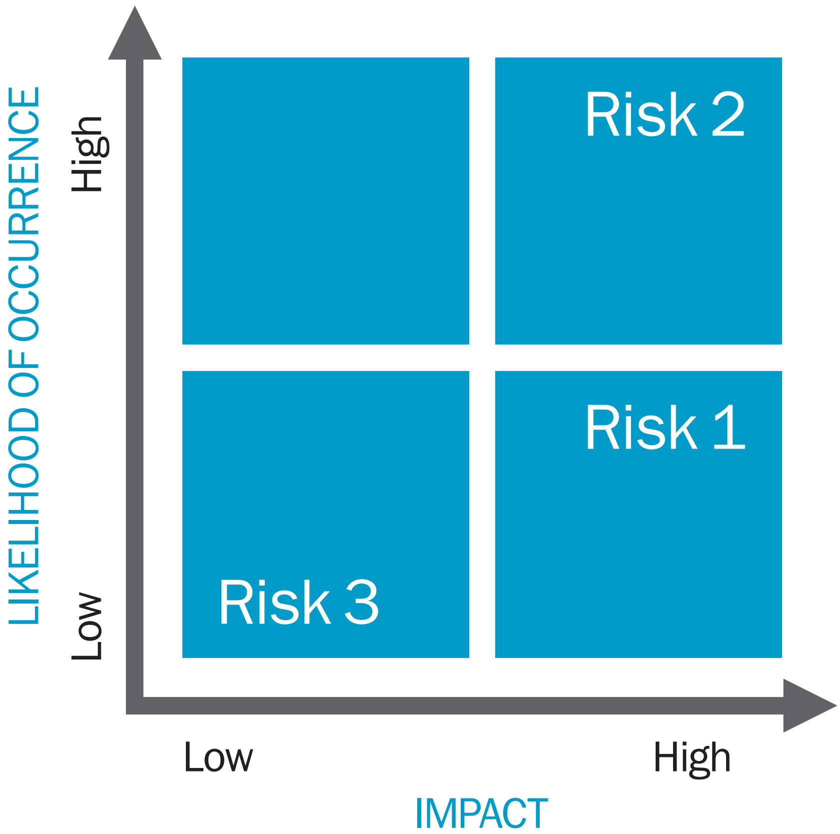
In addition the charity expects to meet minimum standards required by legislation and best practice in operational areas covering the following:

- *IT and data protection*
- *HR*
- *Health and safety*
- *PQASSO **
- *Governance*
- *Financial accounting and reporting*
- *Management of volunteers, etc*

** PQASSO is an assessment tool which provides quality assurance on organisational controls and management processes*

The risk of falling short of these standards is mitigated as far as possible by ensuring that appropriate policies and working practices are adopted in each of these key areas and that staff are adequately experienced and trained to manage this. Where necessary, external advice is sought to supplement internal expertise.

Template B
Risk mapping



Risks are plotted in the four quadrants ranked by impact and likelihood of occurrence. Those in the top right hand quadrant showing both the highest likelihood and impact and those in the bottom left hand quadrant showing the lowest likelihood and impact.

Example: A supported housing project has identified three key risks

Risk 1 – Lack of direction and strategic planning
Likelihood: Medium
Impact: High

Assessed as such because the CEO and trustee board have confidence that their current strategic planning processes is working well.

Risk 2 – Service provision is inadequate with poor customer satisfaction
Likelihood: High
Impact: High

Assessed as such because there has been a recent complaint from a service user and a poor report in respect of service care from a recent care inspection visit. This risk will impact on reputation if it is not dealt with promptly.

Risk 3 – Reliance on faulty equipment
Likelihood: Low
Impact: Low

Assessed as such because the computer in the administration office has broken down once in the last 6 months.

Template C
Risk scoring and ranking

Likelihood and impact are assessed separately for each risk and graded from 1 to 5. 1 – lowest likelihood/impact and 5 – highest likelihood/impact. The model is further enhanced by adding extra weighting to the 'impact' element of the model. The idea that the impact of any risk will always have more importance than the likelihood. The scores are then multiplied to give the total ranking for each risk – calculated where impact is x and likelihood is y as: xy+x

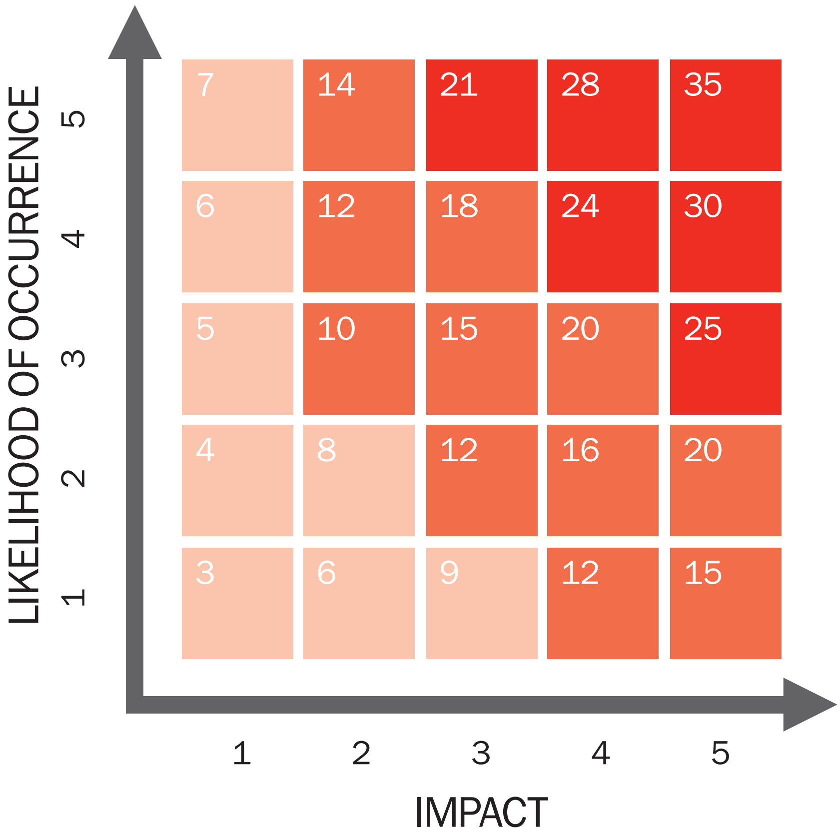
The weighting can be increased further by for example changing this to: xy+2x

Using the example from Template B and applying xy+2x

Risk 1 – Lack of direction and strategic planning
Impact: High (value 5)
Likelihood: Medium (value 3)
Overall rating (5*3)+10 = 25

Risk 2 – Service provision is inadequate with poor customer satisfaction
Impact: High (value 5)
Likelihood: High (value 5)
Overall rating (5*5)+10 = 35

Risk 3 – Reliance on faulty equipment
Impact: Low (value 1)
Likelihood: Low (value 2)
Overall rating (1*2)+2 = 4



- Major risks identified as those scoring > 20
- Moderate risks score between 10 and 20
- Minor risks score < 10

Template D

Risk register

This can be colour coded according to ranking of risk – using xy+2x

Risk identified	Likelihood of occuring (Y)	Severity of impact (X)	Overall risk (X*Y) + 2X	Existing control procedures	Proposed impovements	Action by	Residual risk (Note 1)	Timetable for action	Follow up review
Governance Lack of direction in strategic planning	3	5 Leading to loss of contracts and damage to reputation	25	• Three year strategic plan • Annual budgets • Trustees and SMT closely involved in production and sign off	• Analyse feedback from funders & key findings • Beneficiary survey of needs & satisfaction • Review objectives and mission and reflect in updated strategic plan	HFR/CEO CEO SMT/ Board	(5*1) + 10 = 15	xxx xxx xxx	Annual
Operational Poor service provision	5	5 Leading to loss of funding/ contract; loss of reputation; negative publicity; litigation	35	• Training and supervision of staff • Casework meetings • Insurance	• Investigate recent complaint • Review and improve quality control procedures • Improve process for escalation of complaints • Increase frequency of casework review • Monitor minimum training hrs	DS DS /CEO DS /CEO DS DS	(5*3) + 10 = 25	Immediate Immediate Immediate Immediate Immediate	Quarterly Quarterly Quarterly Quarterly Quarterly

CEO – Chief Executive Officer SMT – Senior Management Team HFR – Head of Fundraising DS – Director of Care Services

Note 1 – Residual risk is an appraisal of the risk that will remain and cannot be fully eliminated following actions taken to mitigate risk

Template E
Early warning indicator to trigger action on risk

Operational and staffing issues

- High staff turnover
- Loss of key staff or key members of the board of trustees
- Dropping number of volunteers/donors
- Increased complaints from staff/volunteers/beneficiaries/funders
- Accidents involving staff/volunteers/beneficiaries
- Loss of contracts/grants/trading revenue
- Regular rejection of funding or contract bids
- High dependence on a small number of funders
- Poor performance against target
- Projects running over time/incomplete/abandoned
- Project cost overrun
- Late reporting to funders
- IT system downtime
- Significant insurance claims
- Calls against legal charges over assets held by third parties
- Lack of adherence to internal control systems

Financial issues

- Month end close down and control account reconciliations falling behind schedule
- Reporting and management accounting delayed or incomplete
- Increased bad debts
- Late payment of suppliers
- Increased reliance on overdraft or bank exposure
- Reserves falling below level set in reserves policy
- Incidence of fraud

Overall risk framework

- Significant issues arising from internal or external audit
- Poor follow up on issues or reports from external or internal review bodies
- Overdue action on points from risk register
- Escalating risks on risk register
- Legal claims or disputes
- Trustee conflicts of interest
- Activity falling outside charitable objects
- Breaches of regulatory requirements

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More information about Kingston Smith services to the charities sector can be found at www.kingstonsmith.co.uk/charities

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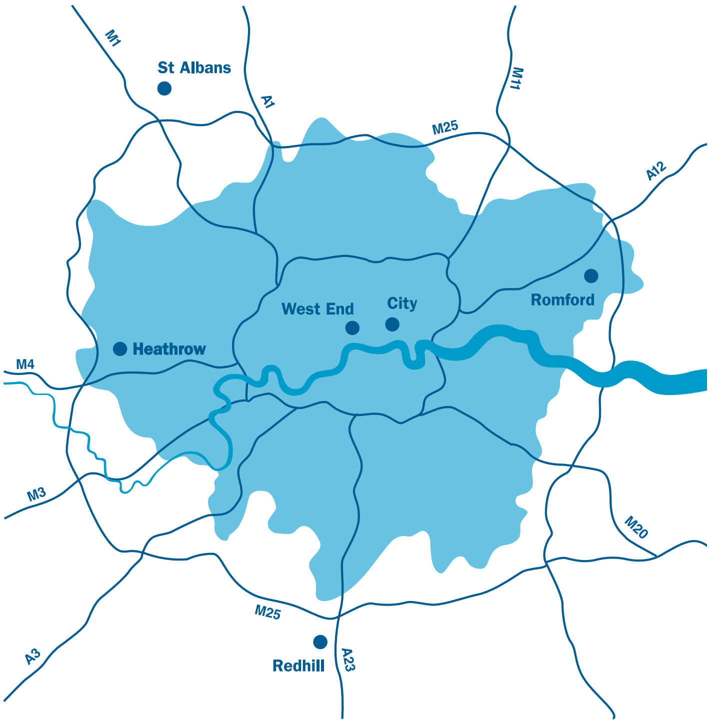

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